ALTO HSR CITIZEN RESEARCH INITIATIVE

INDUSTRIAL CAPACITY BRIEF

Three Hundred Thousand Tonnes

ALTO's Buy Canadian commitments measured against the technical reality of high-speed rail steel.

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Independent, non-partisan research on the proposed Toronto–Quebec City high-speed rail corridor

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CRITICAL FINDING

The gap between framing and reality

ALTO and the Cadence consortium have committed to a **Buy Canadian** procurement approach for the high-speed rail network, supported by federal industrial policy and amplified through ministerial communications. The Minister of Transport has described the project as a once-in-a-generation opportunity to "build more here at home." ALTO and Cadence have begun outreach to the Canadian steel industry. ALTO's procurement page states that key components will be sourced from Canadian suppliers "to the greatest extent possible."

ALTO's chief executive Martin Imbleau has separately confirmed on the record that **no Canadian producer currently makes the high-carbon-density rail steel required for the 4,000+ kilometres of HSR track.** The largest rail supplier in North America is the Pueblo, Colorado mill — historically EVRAZ North America, acquired by Atlas Holdings in 2025 and now operating as Rocky Mountain Steel under the Orion Steel umbrella — which is installing a new Danieli rolling mill specifically tooled for HSR-grade rails up to 88 kg per metre with hardness to 425 BHN.

For the steel categories outside the rails themselves — structural beams for bridges and stations, reinforcing steel, catenary masts, and ancillary components — Canadian capacity exists and the Buy Canadian framing is operationally credible. For the rails, the binding constraint is the absence of domestic production capability. Closing that gap before major construction begins in 2029–2030 would require *either* federal investment in retooling Algoma Steel or ArcelorMittal Dofasco for rail production with sufficient lead time to be operational by then, *or* a public acknowledgment that the rails themselves will be sourced from Pueblo, Colorado or from international suppliers. The political framing and the procurement reality are not currently aligned.

> **ON THE RECORD**
>
> *"We need 4,000 kilometres of steel track that has a high carbon density. None is produced today in Canada."*
>
> — Martin Imbleau, CEO of ALTO, to The Logic, September 30, 2025.

SECTION ONE

The tonnage

ALTO and Cadence have publicly characterized the steel demand of the project as “several hundred thousand tonnes,” with a more specific public figure of 4,000+ kilometres of running rails. That rail-steel quantity is the only firm number on the public record. The remaining steel categories embedded in the project must be estimated from the corridor's stated parameters: 1,000 km of mainly electrified, dedicated passenger track at 320 km/h design speed, with seven stations, multiple major terminals, and a depot architecture supporting a 30–40 trainset fleet.

CATEGORY	TONNAGE	BASIS
Running rails	**≈ 300,000 t**	Imbleau, on record (Sept 2025). 4,000 km × ~60 kg/m HSR profile.
Turnouts, switches, special trackwork	**10,000–20,000 t**	Estimated. ~200–400 turnouts at 25–50 t each.
Catenary support structures (masts, gantries)	**30,000–60,000 t**	Estimated. 17,000–20,000 masts for 1,000 km double-track.
Structural steel — bridges and viaducts	**50,000–150,000 t**	Estimated. Highly route-dependent; concrete-dominant with steel girders at long spans.
Structural steel — stations	**50,000–100,000 t**	Estimated. Seven stations including major terminals.
Maintenance facilities and depots	**10,000–30,000 t**	Estimated. Main depot per segment plus secondary facilities.
Rolling stock (trainsets)	**10,000–25,000 t**	Estimated. ~30–40 trainsets at 400–500 t each.
Signal masts, fencing, ancillary	**15,000–30,000 t**	Estimated. 1,000 km × two sides of fencing plus signal portals.
Reinforcing steel in concrete (rebar)	**200,000–500,000 t**	Estimated. The wild card — highly dependent on share of viaducts and slab track. Often bundled into concrete supply contracts.

Two important framing notes apply to the table above. First, the running-rail figure (≈ 300,000 tonnes) is the only number ALTO has stated directly. Other entries are CRI estimates based on standard HSR engineering parameters; they are intended to illustrate proportion, not predict procurement bills. Second, **reinforcing steel in concrete (rebar) is the largest single variable in the total.** Modern HSR construction is dominated by concrete viaducts and (often) slab track, both of which carry heavy reinforcement. Whether rebar appears in ALTO's “steel procurement” framing depends on contract structure: if it is bundled into concrete supply contracts, as is typical, it may not be counted at all in the project's headline steel number.

What the breakdown means for Buy Canadian credibility

On a tonnage basis, running rails represent **approximately 30–40% of total steel demand when rebar is included, or 45–60% when rebar is excluded.** Outside the running rails, structural beams, plate, rebar, catenary masts, and most ancillary components can be supplied by Canadian producers — ArcelorMittal Dofasco in Hamilton, Algoma Steel in Sault Ste. Marie, Stelco. The Canadian Steel Producers Association has confirmed this directly: Canadian producers will have no trouble supplying almost all of the structural steel needed for bridges, stations, and the trains themselves.

The supply gap is specifically the high-carbon-density rail steel. This is the most technically demanding category, the most politically symbolic, and the one that will most visibly determine whether “Buy Canadian” framing of the procurement holds up under scrutiny. If 30–40% of the total steel — the rails themselves — comes from outside Canada while the remaining 60–70% is Canadian-sourced, the project will be able to truthfully describe itself as “mostly Canadian” by tonnage and revenue, **while the high-speed rails are not.**

SECTION TWO

The cost asymmetry

Tonnage and dollars do not move together. Steel categories differ in unit price by an order of magnitude — from commodity-priced rebar at one end, to premium HSR rails in the middle, to specialty manufactured trackwork at the high end. When the tonnage figures from Section One are converted to approximate value using industry reference pricing, **the categories that cannot be sourced from Canadian producers represent a substantially larger share of the procurement than tonnage alone suggests.**

The share of project steel that cannot currently be sourced from Canadian producers (running rails, specialty trackwork, and rolling stock steel) is approximately **35% by tonnage**. The same share rises to approximately **50% by value** when tonnes are converted to dollars (steel categories only, excluding rolling stock procurement). HSR-grade rail steel prices in commodity markets at roughly **three times** the per-tonne cost of standard reinforcing rebar, and specialty HSR trackwork is closer to **ten times**.

CATEGORY	APPROX TONNAGE	REFERENCE PRICE (CAD)	APPROX VALUE (CAD)
Running rails — HSR profile	~300,000 t	$2,500–$3,500 / t	**$750M – $1.05B**
Turnouts, switches, special trackwork	10–20,000 t	$8,000–$12,000 / t	**$120M – $180M**
Catenary support structures	30–60,000 t	$2,500–$3,500 / t	**$115M – $160M**
Structural steel — bridges, viaducts	50–150,000 t	$1,800–$2,500 / t	**$180M – $250M**
Structural steel — stations	50–100,000 t	$1,800–$2,500 / t	**$135M – $190M**
Maintenance facilities, depots	10–30,000 t	$1,500–$2,000 / t	**$30M – $40M**
Signal masts, fencing, ancillary	15–30,000 t	$1,500–$2,000 / t	**$34M – $45M**

CATEGORY	APPROX TONNAGE	REFERENCE PRICE (CAD)	APPROX VALUE (CAD)
Reinforcing steel (rebar)	200–500,000 t	$1,000–$1,200 / t	**$350M – $420M**

The pattern is consistent across categories. Rebar — the largest tonnage line outside the running rails, and a category Canadian producers and importers can supply without difficulty — is also the cheapest per tonne, pricing in commodity markets at roughly $1,000–1,200 CAD. HSR-grade running rails carry a premium of roughly three times that price, reflecting the high-carbon-density specification, head-hardening, and the limited number of mills globally capable of producing 100-metre rails to the relevant hardness. Specialty HSR trackwork — high-angle switches, swing-nose crossings — is sold as engineered units rather than commodity steel, and its effective per-tonne cost is closer to ten times that of rebar.

Rolling stock: separate procurement, larger scale

Rolling stock is not included in the per-tonne table above. HSR trainsets at 320 km/h design speed are procured as complete vehicles, with steel content representing only a small fraction of trainset value — the larger value sits in propulsion, electronics, interiors, and signalling. A fleet of **30–40 trainsets** at current-generation HSR reference pricing of roughly **$50 million USD per trainset** implies a separate trainset procurement of **$2 to $3 billion CAD**. This procurement is overwhelmingly foreign-sourced, because HSR trainsets at this design speed are not manufactured in Canada (Canadian-based final assembly under Alstom ownership is possible, but the trainset content is overwhelmingly imported).

Including rolling stock procurement alongside the steel categories, the foreign-sourced share of the project's combined steel and rolling-stock procurement rises to approximately **65–75% by value.**

Why the asymmetry matters

A Buy Canadian framing measured in tonnage would substantially overstate the share of the project that domestic suppliers can win. A framing measured in dollars would more accurately reflect both the procurement at stake and the structural reason for the asymmetry. The categories where Canada does not have current capacity — premium-grade rail steel, specialty trackwork, complete trainsets — are also, structurally, the highest-margin categories of railway procurement. They command a premium price precisely because they require specialized capability and capital investment that Canada lost or never developed. **Closing the tonnage gap is one decision; closing the value gap is a substantially larger one.**

Reference prices are open-market commodity and specialty steel ranges in Canadian dollars, drawn from industry trade reporting (MEPS International, Steel Business Briefing, Railway Gazette market commentary). Actual contract prices for the ALTO procurement may differ from these reference ranges depending on specifications, contract structure, currency, tariff conditions at the time of procurement, and bundling decisions. The ranges above are intended to illustrate the order-of-magnitude differences between categories, not to predict procurement outcomes.

SECTION THREE

What ALTO has committed to in public

ALTO's published commitments on steel sourcing combine federal policy framing, ministerial communications, and the project's own procurement-page language. The commitments are not contractual undertakings to source any particular percentage of steel from Canadian producers; they are framing statements of intent, supported by an outreach process that began in November 2025.

The November 2025 outreach announcement

On November 18, 2025, ALTO and Cadence announced that they would meet with leaders across the Canadian steel industry to “better understand current production capabilities, scaling potential, and opportunities for modernization.” The release framed the procurement as *“a rare opportunity for Canada's steel and manufacturing sectors to expand capacity, accelerate investment, and innovate.”* The release stated that the network will require more than 4,000 km of steel rails in addition to massive quantities of structural beams, catenaries, and other core materials.

The Minister of Transport's framing

Minister Steven MacKinnon, in the same November 18 release: *“This initiative is one of Canada's largest infrastructure investments in decades. It is about strengthening our country by building more here at home. This new High-Speed Rail Network will be transformational.”* Cadence general manager Daniel Farina, in the same release: *“We will need huge quantities of steel, and we want Canadian steelmakers to be ready to respond to request for proposals, because they are coming fast! This is a massive opportunity for Canadian suppliers.”*

ALTO's procurement-page language

ALTO's Procurement page, updated in February 2026, contains the most precise statement of intent: *“Building on the government's Buy Canadian initiative, ALTO will seek to leverage domestic resources by sourcing key components for the future rail network from Canadian suppliers wherever possible.”* The same page contains an important qualification: *“However, we recognize that the scale and technical complexity of the project will require the input of international experts and technologies that are not currently deployed in North America.”* The qualification is doing significant work; it leaves room for international rail steel sourcing without contradicting the framing.

What is — and is not — promised

ALTO has not committed to a percentage Canadian-content target. It has not committed to a domestic-rail-steel timeline. It has not committed to require Cadence to source rails from any particular jurisdiction. The commitments are: (a) Canadian suppliers will be preferred *where possible*; (b) outreach to the Canadian steel industry will inform the procurement approach; (c) international suppliers will be used where domestic capability does not exist. The third commitment is the operative one for rails.

SECTION FOUR

The technical reality, by steel category

This section examines each major steel category in turn, comparing what ALTO's Buy Canadian framing would require to what the Canadian steel sector currently produces. Each category is assessed for domestic capacity using the same three-state ledger used elsewhere in CRI's work: Met (Canadian production exists at the required scale and specification); Partial (Canadian production exists but capacity, specification, or timeline is constrained); Not Met (Canadian production does not currently exist at the required specification).

Running rails — high-carbon-density HSR profile

ALTO'S CLAIM / FRAMING	TECHNICAL / MARKET REALITY
ALTO's framing: Canadian suppliers will be preferred for the 4,000+ km of steel rails required by the network. The Minister of Transport has framed the project as an opportunity for Canadian steelmakers to expand capacity. Federal industrial policy supports the framing.	**Imbleau, on the record (Sept 30, 2025):** “We need 4,000 kilometres of steel track that has a high carbon density. None is produced today in Canada.” The Canadian Steel Producers Association confirms this: Canada used to make rail steel, decades of US free-trade integration meant the supply moved to American mills, and re-establishing domestic capability would require retooling. The CSPA characterizes the rail demand as “both a lot of steel and not very much” against Canada's 12-million-tonne annual production — meaning retooling is technically feasible but the business case depends on sustained demand beyond ALTO.
DOMESTIC CAPACITY: NOT MET	

Turnouts, switches, and special trackwork

ALTO'S CLAIM / FRAMING	TECHNICAL / MARKET REALITY
Implicit in ALTO's Buy Canadian framing — outreach to the Canadian steel industry covers “core materials.”	Specialty trackwork for HSR (high-angle switches, swing-nose crossings, slip switches) is a niche global market dominated by European and Japanese specialty manufacturers (Voestalpine VAE, Vossloh, Nippon Kokan). Canadian capacity for HSR-grade specialty trackwork does not currently exist at scale and would require either licensing arrangements or international procurement. The tonnage is small relative to running rails but the technical content is high.
DOMESTIC CAPACITY: NOT MET	

Structural steel — bridges, viaducts, stations

ALTO'S CLAIM / FRAMING	TECHNICAL / MARKET REALITY
ALTO/Cadence have confirmed that “structural beams” will be a major component of Canadian steel sourcing. The CSPA has stated Canadian producers can supply this category without difficulty.	Canadian capacity exists. ArcelorMittal Dofasco (Hamilton), Algoma Steel (Sault Ste. Marie), and Stelco produce structural beams, plate, and heavy sections at the scales required. The federal government has pledged more than $800 million to ArcelorMittal and Algoma for equipment upgrades and emissions reduction. The principal constraint is order timing and competing demand from other infrastructure projects, not absolute capacity.
DOMESTIC CAPACITY: MET	

Reinforcing steel (rebar) for concrete structures

ALTO'S CLAIM / FRAMING	TECHNICAL / MARKET REALITY
Rebar is not specifically called out in ALTO's public framing. In practice, rebar is usually bundled into concrete supply contracts and may not appear under “steel procurement” at all.	Canadian producers and importers serve the rebar market at the volumes required. Even if total rebar demand reaches 500,000 tonnes — the upper bound estimate — domestic plus traditional import channels (largely from Mexico and Turkey for commodity rebar) can supply this with no project-specific intervention required.
DOMESTIC CAPACITY: MET	

Catenary masts and electrification infrastructure

ALTO'S CLAIM / FRAMING	TECHNICAL / MARKET REALITY
ALTO's framing names “catenaries” as a core material category for Buy Canadian sourcing.	Catenary support structures (masts, gantries, cantilevers) are produced in Canada by specialty manufacturers and can be fabricated by general structural steel producers to drawings. The copper contact wire itself is a separate commodity not addressed here. Canadian capacity for the steel components is adequate; the engineering and design content typically comes from European suppliers (SNCF-affiliated firms, Siemens, Alstom) given the SNCF connection in Cadence.
DOMESTIC CAPACITY: PARTIAL	

Rolling stock (trainsets)

ALTO'S CLAIM / FRAMING	TECHNICAL / MARKET REALITY
Rolling stock is not the focus of the November 2025 steel outreach. Trainsets are a separate procurement line.	HSR trainsets at 300+ km/h are produced by a small number of international manufacturers: Alstom (France), Siemens Mobility (Germany), Hitachi Rail (Japan/UK), Talgo (Spain), CAF (Spain), CRRC (China — politically excluded). Canadian-based final assembly is possible (Bombardier's legacy facilities under Alstom ownership) but the trainset steel content is overwhelmingly imported. The SNCF connection in Cadence strongly suggests an Alstom procurement.
DOMESTIC CAPACITY: NOT MET	

Ancillary — fencing, signal masts, depot structures

ALTO'S CLAIM / FRAMING	TECHNICAL / MARKET REALITY
Falls within general Canadian steel sourcing.	Canadian capacity is adequate. Commodity steel products including fencing, signal portals, depot framing, and substation structures can be sourced from domestic producers without specialized investment.
DOMESTIC CAPACITY: MET	

SECTION FIVE

The supplier landscape

Three categories of suppliers are positioned to fill the rail-steel gap: domestic producers willing to retool; the Pueblo, Colorado mill, which is the largest rail supplier in North America and is installing a new HSR-grade rolling mill; and established European and Asian HSR rail steel suppliers. Each carries a distinct set of trade-offs.

Domestic candidates — Algoma Steel and ArcelorMittal Dofasco

The two principal candidates for re-establishing Canadian rail steel production are Algoma Steel (Sault Ste. Marie, Ontario) and ArcelorMittal Dofasco (Hamilton, Ontario). Both have received substantial federal funding for equipment upgrades and emissions reduction — totalling more than $800 million across the two firms. Industry Minister Mélanie Joly has signalled that further federal support for retooling is on the table.

When approached by The Logic in September 2025, ArcelorMittal's response was non-committal: the company indicated it would assess long-term market potential and demand beyond ALTO before committing to a pivot. Algoma did not respond to inquiries. The CSPA's framing — 300,000 tonnes is “both a lot of steel and not very much” against Canada's 12-million-tonne annual production — captures the underlying business problem. **Retooling for HSR rail steel makes commercial sense only if the order is repeating, not one-off.** The federal government's posture, as expressed publicly by Joly, is that it may be willing to help finance the pivot — but no announcement of such financing has been made for rail steel specifically.

The Pueblo, Colorado mill — Rocky Mountain Steel / Orion Steel

The Pueblo facility was, until 2025, EVRAZ North America's flagship rail mill — the largest rail supplier in North America and one of the world's largest solar-powered steel mills. Following the imposition of UK sanctions on EVRAZ's Russian parent in 2022, the North American assets were put up for sale. In June 2025, Connecticut-based private equity firm Atlas Holdings completed a $500 million acquisition, forming Orion Steel as the new umbrella, with Pueblo operating as Rocky Mountain Steel.

Crucially for ALTO: in May 2025, EVRAZ (now Orion) selected Italian engineering firm Danieli to supply **a new premium rail rolling mill at Pueblo with capacity of 670,000 short tons, producing 100-metre flat-bottom rails up to 88 kg per metre with hardness up to 425 BHN.** These specifications are explicitly designed for heavy-haul and high-speed railways. The mill is the only existing North American facility tooled to HSR-grade specifications, and on the public record it is being built specifically to capture demand from projects like ALTO.

The complication is political. **Canada–US trade relations are subject to 50% American tariffs on Canadian steel as of mid-2025, with no signs of resolution.** The most logical North American supplier of HSR rail steel sits in the country with which Canada is in an active trade dispute. The Logic's reporting of Imbleau's September 2025 framing identifies precisely this dynamic: *"Now that Canada is in a trade war with the United States, with steel among this country's hardest-hit industries, buying domestically is extra important."* Sourcing 300,000 tonnes of HSR rail steel from Pueblo while Canadian steel exports face 50% tariffs would be politically untenable on its face.

International suppliers — Europe and Japan

The established global suppliers of HSR rail steel are concentrated in Europe and Japan: **voestalpine (Austria), ArcelorMittal Europe (Luxembourg-headquartered with European mills), Tata Steel Europe (UK/Netherlands), Nippon Steel (Japan), and JFE Steel (Japan).** These are the actual rail suppliers to most operating European and Asian HSR systems. The SNCF Voyageurs presence inside the Cadence consortium creates a natural commercial pathway to European supply: SNCF is a long-standing customer of voestalpine VAE for trackwork and of ArcelorMittal Europe for rails.

International sourcing carries its own complications. Shipping costs and lead times for 300,000 tonnes of 100-metre rails across the Atlantic or Pacific are substantial; rail mills typically build to order with 12–24 month lead times; and the political optics of sourcing the headline category of steel internationally — while the federal government's framing emphasizes Canadian content — are unfavourable. **International procurement is, however, the default fallback if domestic retooling is not financed in time and US sourcing remains politically blocked.**

SECTION SIX

The trade and policy context

ALTO's steel sourcing decision will be made inside a Canada–US trade environment that is the most adversarial of the post-NAFTA era. Three policy facts shape the available options.

US tariffs on Canadian steel at 50%

As of mid-2025, the United States has imposed tariffs of 50% on Canadian steel imports. Canada produces approximately 12 million tonnes of steel annually and historically exports about half of it to the US. The tariffs have caused substantial disruption across Canada's steel sector. Against that backdrop, **sourcing the largest single steel procurement in modern Canadian infrastructure history from a US mill creates obvious political difficulty.** It is not impossible — Pueblo's product is the only North American HSR-grade rail on offer — but it would invite criticism from both labour and industry constituencies that the federal government is currently working to keep onside.

The federal Buy Canadian framework

The Buy Canadian policy applied to ALTO is the same policy framework introduced across federal infrastructure procurement in 2025 to support the domestic steel sector during the tariff dispute. It is a preference framework rather than a hard requirement: domestic suppliers are favoured *where possible*, with exemptions where Canadian capability does not exist. The exemption clause is the operative provision for ALTO's rails. ALTO's procurement page acknowledges this directly in its “international experts and technologies that are not currently deployed in North America” language.

Bill C-15 and project-acceleration legislation

The High-Speed Rail Network Act, included in the federal budget implementation legislation tabled in November 2025, accelerates ALTO's regulatory pathway. Among other provisions, the bill addresses how procurement priorities will be set for the project. The legislation's treatment of domestic-content requirements has not been the subject of extensive public commentary, but it is the legal frame inside which ALTO's procurement decisions will be made.

The pivot-financing question

Industry Minister Joly's public statement that federal funding to help Canadian steelmakers retool for rail production is on the table is the most consequential outstanding policy question. If a federal package of (illustratively) $500 million–$1 billion to Algoma or ArcelorMittal Dofasco for HSR-rail capacity were announced in 2026, with delivery commitments to ALTO and other

Canadian rail projects, the Buy Canadian framing would gain operational credibility. **Absent such an announcement, the credibility of the framing depends on a procurement outcome that does not yet exist.**

SECTION SEVEN

Implications

The implications of the framing-versus-reality gap divide naturally between what ALTO and the federal government could address now, and what depends on procurement decisions that lie one or two years ahead.

What could be committed to now

Domestic-content target, by category. ALTO could commit publicly to a percentage Canadian-content target for non-rail steel — structural beams, rebar, catenary masts, ancillary components — which is the category where domestic capacity exists. A commitment in the 80–90% range for non-rail steel would be both achievable and verifiable, and would test the framing without committing to outcomes that cannot be delivered. The current "to the greatest extent possible" language is not a target.

Honest framing on rails. ALTO and the Minister of Transport could acknowledge publicly that high-carbon-density rail steel is not currently produced in Canada, that the procurement of this category will depend on either retooling Canadian producers (with federal financing) or sourcing internationally, and that the "Buy Canadian" framing applies more strongly to other steel categories. Imbleau has already made the underlying admission on the record; the framing has not caught up.

A retooling commitment, or a clear acknowledgement that there will not be one. Industry Canada could announce, with a timeline, the federal financing package that would enable Algoma or ArcelorMittal Dofasco to produce HSR rail steel by 2029–2030. If such a package is not contemplated, that should also be said publicly. The current ambiguity — Joly's "may help" phrasing — is itself a policy posture, but one that leaves the procurement question unresolved for both producers and ALTO planners.

Transparency on category breakdown. ALTO could publish a category-level breakdown of expected steel demand, similar to the table in Section One above, with associated sourcing assumptions. The current public framing — "several hundred thousand tonnes" — is too aggregated to support meaningful public scrutiny of where Buy Canadian commitments will and will not hold.

What depends on future decisions

The actual sourcing outcome for rails. This decision will be made through Cadence's procurement process, beginning with "pre-procurement activities" in 2026 and RFPs in 2027–2028. The decision will reflect the available market at that time — including whether US tariffs persist, whether Canadian retooling has been financed, and what European and Japanese suppliers offer. None of these inputs is fixed today.

The political durability of the Buy Canadian framing. If the procurement outcome is substantially Canadian (with rails from a retooled domestic producer) the framing will be vindicated. If the procurement outcome is substantially international (with rails from voestalpine or Nippon Steel) the framing will be retrospectively understood as aspirational language that masked an early procurement decision. The political consequence will depend on whether the public has been prepared in advance for the outcome.

WHERE THINGS STAND

Summary ledger

In summary, against the substantive content of ALTO's Buy Canadian commitments and the technical reality of HSR steel procurement:

MET	**Structural steel — bridges, viaducts, stations:** Canadian capacity exists at the required scale. The Buy Canadian framing is operationally credible for this category.
MET	**Reinforcing steel (rebar):** Domestic and traditional import channels meet demand without project-specific intervention.
MET	**Ancillary steel (fencing, signal masts, depot framing):** Canadian capacity is adequate; commodity steel category.
PARTIAL	**Catenary masts and electrification structures:** Steel fabrication can be Canadian; engineering and design content typically from European suppliers via the SNCF connection in Cadence.
NOT MET	**Running rails — high-carbon-density HSR profile:** Not currently produced in Canada (Imbleau, on record, September 2025). Sourcing options: retooled domestic producer (requires federal financing not yet announced), Pueblo / Orion Steel (politically constrained by US tariffs), or international suppliers (voestalpine, Nippon Steel, etc.).
NOT MET	**Turnouts, switches, special trackwork:** HSR-grade specialty trackwork is a niche international market; Canadian capacity does not exist at scale.
NOT MET	**Rolling stock steel content:** Trainsets at 300+ km/h are produced internationally; Canadian-based final assembly is possible but steel content is overwhelmingly imported.
NOT MET	**Published category-level Canadian-content targets:** Not committed. Current framing is aspirational language (“to the greatest extent possible”) rather than measurable targets.

NOT MET	**Public acknowledgement of the domestic rail-steel gap:** Imbleau has acknowledged this on the record; ministerial communications and ALTO's procurement framing have not been adjusted to reflect it.
NOT MET	**Federal retooling-financing announcement:** Industry Canada has signalled possible support without commitment. Lead time required for a Canadian rail steel mill to be operational by 2029–2030 is shrinking.

ALTO's chief executive has confirmed publicly that high-carbon-density rail steel is not currently produced in Canada. The Buy Canadian commitments that have been published, taken category by category, are operationally credible for steel outside the rails themselves and **are not currently credible for the rails**. The gap between framing and reality is closeable — through federal financing of domestic retooling, through honest public framing, or through both — but it is not closed today, and the time available to close it before procurement decisions are locked in is finite.

SOURCES

Primary documents and reporting

Reevely, David. “Alto wants piles of Canadian steel to keep high-speed rail on track.” The Logic, September 30, 2025. The article carries Imbleau's “none is produced today in Canada” admission and the Catherine Cobden (Canadian Steel Producers Association) commentary on the structural reasons for the gap. https://thelogic.co/news/alto-high-speed-rail-steel/

Alto. “Alto and Cadence to begin outreach to steel industry in support of Toronto–Quebec City high-speed rail project.” Press release, November 18, 2025. https://www.altotrain.ca/en/news/alto-cadence-outreach-steel-industry-support-HSR-project

Alto. “Procurement.” Page on altotrain.ca, updated February 17, 2026. Contains the “to the greatest extent possible” framing and the qualifying acknowledgement that international suppliers will be used where domestic capability does not exist. https://www.altotrain.ca/en/about-us/procurement

Atlas Holdings. “Atlas Holdings to Acquire EVRAZ North America, a Leading Steel Producer in the U.S. and Canada.” Press release, June 27, 2025. https://www.atlasholdingsllc.com/news/atlas-holdings-to-acquire-evraz-north-america-a-leading-steel-producer-in-the-u-s-and-canada/

Heat Treat Today. “Atlas Acquires Steelmaker EVRAZ North America; Forms Orion Steel.” August 6, 2025. Confirms the formation of Orion Steel and the operational continuation of Pueblo's Rocky Mountain Steel as the largest rail supplier in North America.

Danieli. “EVRAZ North America selects Danieli to supply new premium rail mill.” Press release, May 27, 2025. Confirms specifications: 670,000 short ton capacity, 100-metre rails up to 88 kg/m, hardness up to 425 BHN, designed for heavy-haul and high-speed railways. https://www.danieli.com/en/news-media/news/evraz-north-america-selects-danieli-supply-new-premium-rail-mill_37_425.htm

Railway Age. “Alto HSR Project Advances (UPDATED 12/15).” December 15, 2025. Coverage of the November 18 steel-industry outreach announcement with verbatim ministerial quotes.

ReNew Canada. “High-speed rail project to support Canadian steel industry.” Coverage of November 18, 2025 announcement. https://www.renewcanada.net/high-speed-rail-project-to-support-canadian-steel-industry/

Daily Commercial News (Construct Connect). “Alto wants steel industry's feedback on ‘readiness' for massive high-speed rail project.” November 20, 2025.

ALTO HSR Citizen Research Initiative

citizenresearch.ca · Industrial Capacity Brief · May 10, 2026

Independent, non-partisan research on the proposed Toronto–Quebec City high-speed rail corridor.