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March 30, 2022

File No.: 5020-30 Major Vessels

Via Email: [omar.alghabra@parl.gc.ca](mailto:omar.alghabra@parl.gc.ca)  
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The Honourable Omar Alghabra  
Minister of Transport  
330 Sparks Street  
Ottawa ON, K1A 0N5

Dear Minister Alghabra:

**Re: Air pollution scrubbing and dumping from vessels**

I am writing on behalf of Islands Trust Council to request Transport Canada take further action on air pollution and dumping from marine vessels, including stopping the use of exhaust gas cleaning systems (scrubbers) and mandating a stricter fuel standard in Canadian waters. This would prevent ships from using the current workaround of using scrubbers on marine exhaust systems, which result in large discharges of acidic waste and toxic pollutants into the water column instead of the atmosphere. You may wish to look at requirements implemented in California which include requiring or incentivizing the use of marine gas oil, instead of heavy fuel oil with scrubbers.

According to a November 2020 report by the International Council on Clean Transportation entitled "[Air Emissions and Water Pollution Discharges from Ships with Scrubbers](#)", 85% of scrubbers are open-loop systems. Meaning, they continuously dump toxic, acidic wastewater straight into the ocean. From the same report, it is noted that Vancouver is the fourth most scrubber-polluted port in the world.

In a 2022 [National Vessel Dumping Assessment Report](#) by World Wildlife Fund Canada, ships generate 143 billion litres of scrubber wash water annually in Canadian waters. Approximately 10 per cent of this, or 14.5 billion litres, is produced and subsequently dumped in marine protected areas and other effective area-based conservation measures (OECMs).

We are concerned about the impact of wastewater discharge into the Salish Sea. The Salish Sea's highly productive waters are one of the world's most biologically diverse, including species that are economically and culturally significant to Coast Salish Indigenous Nations. The Salish Sea ecosystem supports large numbers of marine birds, as well as iconic species such as Southern Resident Killer Whales and Pacific salmon. The ecosystem includes the Fraser River estuary, providing key habitat for many species of animals including salmon and migratory birds.

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Islands Trust is a special-purpose government representing over 30,000 people living within the Islands Trust Area and another 10,000 non-resident property owners. The Islands Trust Area is located within Coast Salish territory and is the homeland to over 28,000 Coast Salish Peoples who have called this place home since time immemorial. Islands Trust is responsible for preserving and protecting the Islands Trust Area's unique environment and amenities by planning and regulating land use, development management, education, cooperation with other agencies, and land conservation. The area covers the islands and waters between the British Columbia mainland and southern Vancouver Island. It includes 13 major islands and more than 450 smaller islands covering 5,200 square kilometres.

Yours sincerely,



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cc: Islands Trust Council  
Bowen Island Mayor and Council  
Islands Trust Area MP's  
Islands Trust Website  
Anna Barford, Canada Shipping Campaigner, Stand.earth