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April 15, 2026

File No.: 11-5020-30-Oil Spills

Via email: OPP.EMEM.HNS-PPO.AGUM.SNPD@tc.gc.ca

Oceans Protection Plan
Transport Canada
300 Sparks Street
Ottawa ON K1A 0N5

To Whom it May Concern:

Re: Discussion Paper “Potential regulations to increase access to marine emergency services and to improve response to pollution incidents”

I am writing, on behalf of the Islands Trust Executive Committee, to express our support for the direction Transport Canada is taking towards increasing access to marine emergency services and to improve response to pollution incidents, as expressed in its [second discussion paper](#).

Islands Trust is a special-purpose government representing over 30,000 people living within the Islands Trust Area and 10,000 non-resident property owners. The Islands Trust Area, is located within Coast Salish territory, 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 with over 1,300 kilometres of shoreline. Islands Trust is responsible for preserving and protecting the Islands Trust Area and its unique amenities and environment through conservation-oriented land use planning and regulation, education, and cooperation with First Nations and others.

We are supportive of bold actions towards requiring certain vessel types to have arrangements in place to access marine emergency services such as marine firefighting and disabled vessel assistance (e.g. salvage and emergency towing) and towards improving how vessels and handling facilities prepare for and respond to marine incidents that involve hazardous and noxious substances.

We wish to note that within a context of growing vessel traffic volume and increasing vessel sizes in the Salish Sea, we are concerned there is likely insufficient emergency capacity with respect to towing tugs of opportunity in the region with the necessary bollard pull capability, the necessary equipment, and properly trained crews ready to respond at a moment's notice in poor weather and heavy seas. There is a need for an equivalent in Canada to Washington State's Neah Bay emergency response towing vessel, and one that is equipped to respond to the largest vessels that transit the region.

The [Tanker Safety Expert Panel's report](#) stated that the waters around the southern tip of Vancouver Island were one of four areas in Canada with the highest probability of a large marine spill. The report also stated that the southern coast of British Columbia, including Vancouver Island, was one of two areas in Canada with the highest potential impact from a marine spill.

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Preserving and protecting over 450 islands and surrounding waters in the Salish Sea

Bowen Denman Hornby Gabriola Galiano Gambier Lasqueti Mayne North Pender Salt Spring Saturna South Pender

The Salish Sea is a special region in need of special consideration and precautionary measures.

In addition, a significant spill within the interconnected waters of the Gulf Islands and San Juan Islands region would have major economic consequences on both sides of the border. This region supports a highly interdependent economy rooted in tourism, marine recreation, fisheries, and small scale-local businesses that depend on clean water and a healthy marine environment. A spill could disrupt ferry and shipping routes, deter visitors for multiple seasons, damage local fisheries and shellfish harvesting, and impose long-term costs on coastal communities that rely on the ecological integrity of the Salish Sea. The transboundary nature of these waters further amplifies the scale and duration of such economic impacts.

There have also been a series of recent incidents inshore that should serve as clear evidence that even with our existing traffic volumes, there is a need to enhance the emergency response capabilities in the Salish Sea. Two months ago, the 200-meter bulk cargo ship, Goodwin Island, lost power in the middle of Haro Strait. We understand it took three hours for a suitable tug (Seaspan Raven) to arrive. Given the values present in the Salish Sea, we ask that Transport Canada undertake studies to ensure that tug availability and suitability is properly assessed to ensure rapid response with the right crew with the right training with the right equipment.

The Islands Trust Council and San Juan County Council have previously written joint letters to [Minister Garneau](#) and [Minister Joyce Murray/Minister Alghabra](#). In both of these letters it has been expressed that there needs to be an Emergency Response Towing Vessel (ERTV) in the vicinity of Sidney, British Columbia to enable a fast response to Turn Point and Kelp Reef which, we understand, pose the most significant navigational risks to vessels bound to and from the Port of Vancouver.

We are concerned there may be insufficient emergency towing capacity in the Salish Sea for current or future risk. In the waterways and anchorages of the Salish Sea there is a limited window of time to respond before a vessel experiencing a loss of propulsion or steering might potentially run aground on the many reefs, or shoreline, or worse, collide with another vessel. A standby, emergency towing vessel is a key resource to help prevent oil spills in this ecologically-significant region characterized by many islets and submerged reefs surrounded by fast moving currents. The vessel not only needs to have sufficient power to tow large ships, but it should also be capable to fight fires and assist in oil spill response.

Thank you for the work on this initiative to date and for considering this input.

Yours sincerely,



Laura Patrick
Chair, Islands Trust Council

cc: Bowen Island Municipal Council
San Juan County Council
Islands Trust Council
Islands Trust Area MPs