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September 17, 2026

File No.: 11-5020-30

Via email: WCOPComment-CommentaireOCO@mpo-bgp.gc.ca; dominic.leblanc@parl.gc.ca

The Honourable Dominic LeBlanc, P.C., K.C., M.P.
President of the King's Privy Council for Canada and Minister responsible for Canada-U.S. Trade,
Intergovernmental Affairs, Internal Trade and One Canadian Economy,
House of Commons
Ottawa ON K1A 0A6

Dear Minister LeBlanc,

Re: Referral of West Coast Oil Pipeline to Major Projects Office

I am writing on behalf of Islands Trust Council to express opposition to the proposed designation of the West Coast Oil Pipeline (WCOP) as a project of national interest under the *Building Canada Act*.

We are concerned that rigorous studies on the project's potential significant risks to species and communities throughout the Salish Sea region could ultimately demonstrate that the WCOP is not in the national interest because of its unmitigable impacts on this ecologically sensitive and deeply cherished part of Canada.

As views and opinions are considered, I request that Islands Trust Council be kept informed of, and involved in, any consultations or initiatives related to proposed industrial projects in the Salish Sea that would result in cumulative risks to the socio-economic and environmental uniqueness of the Islands Trust Area.

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 and encompasses 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.

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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 Thetis

As Canada moves at a speed not seen in generations to unlock its full economic potential, it may be timely, during this transformative period, to pause and consider our nation's commitment to protection of the environment and the well-being of coastal communities.

The Salish Sea is a special region in need of special consideration and precautionary measures. The Tanker Safety Expert Panel's 2013 report stated that the waters around the southern tip of Vancouver Island were one of four areas in Canada with a high 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.

Islands Trust Council has been concerned since this report that there is insufficient preparation for a major oil spill, even with recent improvements by Western Canada Marine Response Corporation.

Islands Trust Council is also concerned about the cumulative environmental and social impacts associated with existing marine shipping in the Salish Sea. There is an urgent need to study the risks and impacts of planned and potentially increasing vessel traffic and vessel sizes before decisions are made to proceed with projects. This is especially true when considering the introduction of Very Large Crude Carriers to the Salish Sea, which could carry 3.5 times the volume of diluted bitumen than currently carried by Aframax tankers in the region.

In addition to the risk of a spill into the Salish Sea from a vessel or on-land tanks, there are many potential impacts of increased marine shipping that need to be studied, including, but not limited to:

- impacts on First Nations' ability to continue with traditional harvesting of marine resources such as shellfish and salmon, and to carry out cultural activities;
- issues associated with anchorages near coastal communities;
- safety of recreational boaters and kayakers;
- introduction of invasive species;
- acoustic disturbance of marine mammals from underwater vessel noise;
- vessel wake erosion of sensitive shorelines;
- vessel wake damage to docks;
- impacts to migratory birds;
- risks to the marine environment from spills associated with earthquakes; and
- air pollution from vessels.

Any studies of these impacts need to examine whether the risks can be sufficiently mitigated or whether they will cause unacceptable, unmitigable impacts. This analysis needs to be completed before any decisions are made to proceed with a project.

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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, lower property values, 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.

Thank you for considering this submission.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Laura Patrick', with a long horizontal flourish extending to the right.

Laura Patrick
Chair, Islands Trust Council

cc: Prime Minister of Canada
Premier of Alberta
Premier of British Columbia
Honourable Christine Boyle, Minister of Housing and Municipal Affairs
Islands Trust Area Members of Parliament
Islands Trust Area Members of the BC Legislative Assembly
Islands Trust Area First Nations
Port of Vancouver
Pacific Pilotage Authority
Chamber of Shipping of British Columbia
Western Canada Marine Response Corporation
Clear Seas
Raincoast Conservation Foundation
Georgia Strait Alliance
Bowen Island Municipal Council
San Juan County Council
Islands Trust Council

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