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via e-mail: DFO.CCG.OPP.Towing-GCC.PPO.Remorquage.MPO@dfo-mpo.gc.ca

Ocean Protection Plan
Canadian Coast Guard

To whom it may concern:

Re: West Coast Towing Needs Assessment

Thank you for the opportunity to comment on the *West Coast Emergency Towing Needs Assessment*. Oil spill prevention and response became a strategic advocacy priority for the Islands Trust Council in 2009 after the bulk carrier, the Hebei Lion, grounded in Plumper Sound, located between Saturna, Mayne, North Pender and South Pender Islands. Our initial concern was compounded by two more near-groundings in Plumper Sound in 2010 and 2011. Since that time, the Islands Trust Council has dedicated significant resources to advocating for strong ship safety measures and oil spill prevention measures.

In May 2018, the Islands Trust Council wrote jointly with San Juan County Council to request that a standby rescue tug be located in Sidney, British Columbia and available to Turn Point, off Stuart Island. Our two governments made this joint request because we share a belief that there is insufficient emergency towing capacity in the Salish Sea to meet the current or future risks associated with vessel traffic.

In the narrow waterways and anchorages of the Salish Sea, there is a very limited window of time to respond before a vessel experiencing a loss of propulsion or steering might potentially run aground on the many unmarked reefs, islets or shoreline, or worse, collide with another vessel. Quick, effective help for a disabled or drifting vessel is key to preventing oil spills in this ecologically-significant region characterized by fast moving currents and significant tidal changes.

The Canadian federal government's 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 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. The Assessment report reached similar conclusions. The Salish Sea is a special region in need of special consideration and precautionary measures.

We are pleased that the issue of emergency towing is being considered by the federal government through this report and have the following comments:

- As the report stated that emergency towing is not a recognised term in international convention and law, there appears to be a need for a clear definition for "emergency towing" that can be used internationally as the term "salvage" is inadequate.

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- Transport Canada should institute a certification process for the crew of commercial tug operators that is specific to different towing capacities. We are concerned that commercial salvage operations might fail as a result of inadequate experience and practice.
- We are concerned to read that there is a lack of accurate information on tank barges and that they represent a “large and risky unknown” that should be better understood in order to develop adequate mitigation strategies. We request that there be additional studies done in this area and that Transport Canada make it mandatory that these vessels carry Automatic Identification System (AIS) devices.
- We support the report’s recommendation that the Government of Canada conduct an emergency tow risk assessment including an analysis of all possible mitigation measures for the Boundary Pass/Haro Strait zone in the southern Salish Sea. We request that any assessment include the short window of opportunity for a rescue vessel to respond in the region, and place emphasis on the high ecological and social values at risk. We were concerned to read that the response time in the Strait of Juan de Fuca could be as low as 1.5 hours. This window of time seems too small to rely on tugs of opportunity. We have heard the region described as ‘no save’ which is extremely concerning.
- We maintain that an emergency towing vessel stationed in the Strait of Georgia, as indicated in the report, seems critical to reducing transit/response times and will significantly reduce risk.
- The report’s author needed to make assumptions in order to develop the report’s recommendations. We request that further work be completed to verify that the Neah Bay tug service, based in the United States, will continue to respond on the Canadian side of the Salish Sea. We also request an assessment of the likelihood of other Salish Sea tow resources such as commercial tugs and Coast Guard vessels responding, when available and safe to do so, as part of an emergency towing system
- There is a theme in the report that there is no need to plan for the very largest of vessels as they visit infrequently and that it is not practical or cost effective to have a single capability for these rare, extreme incidents. We disagree with this approach given the environmental and social values of the Salish Sea. We have recently declared a climate emergency. No longer can we rely on past weather and sea conditions to predict future risk. In 2018, the Port of Vancouver welcomed the Norwegian Bliss, which is the ninth-largest cruise ship in the world at 168,028 gross tons, and in 2016, the Port of Seattle welcomed the container vessel CMA CGM Benjamin Franklin at 178,228 gross tons. We are concerned that the number of these massive vessels will continue to increase and it is irresponsible to have vessels transiting the Salish Sea that cannot be towed in an emergency.
- We respectfully suggest that no studies assume that the Trans Mountain project will be approved or built and that plans will be made to address current or future needs without relying on funding from the Trans Mountain pipeline expansion project.
- Climate change is not adequately considered in determining future risk: the cited case of two stricken vessels in the same February 1999 storm being a case in point. More recently, the devastating winds experienced in the Salish Sea in December of 2018 fortunately did not compromise any vessels at anchor or transiting the Gulf Islands. I shudder to think of what may have happened at a time when all emergency services were struggling with the impacts of the severity of the storm.

Thank you for considering this input. We look forward to the final release of the report.

Yours sincerely,



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cc: Islands Trust Area MLAs
Islands Trust Area MPs
BOKÉCEN (Pauquachin) First Nation
Cowichan Tribes
Halalt First Nation
Homalco First Nation
Klahoose First Nation
K'ómoks First Nation
Lake Cowichan First Nation
Lekwungen (Songhees) Nation
Lyackson First Nation
MÁLEXEŁ (Malahat) Nation
Penelakut Tribe
Qualicum First Nation
Scia'new (Beecher Bay) First Nation
SEMYOME (Semiahmoo) First Nation
shíshálh First Nation
Snuneymuxw First Nation
Skw̓wú7mesh (Squamish) Nation
Snaw-naw-as (Nanoose) First Nation
S̓XÁUTW̓ (Tsawout) First Nation
Stz'uminus First Nation
SXIMEŁEŁ (Esquimalt) Nation
Tla'amin (Sliammon) Nation
Tsawwassen First Nation
Tseil-Waututh Nation
T'Sou-ke Nation
Wei Wai Kum (Campbell River) First Nation
We Wai Kai (Cape Mudge) First Nation
W̓JOLEŁP (Tsartlip) First Nation
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