



L'ASSOCIATION DES PILOTES MARITIMES DU CANADA
CANADIAN MARINE PILOTS' ASSOCIATION

May 16, 2014

Capt. Gordon Houston
Chair, Tanker Safety Expert Panel
Transport Canada
Place de Ville, 330 Sparks
Ottawa, ON
K1A 0N5

Dear Capt. Houston:

Re: Tanker Safety Review Panel Phase 2 – Arctic Ship-source Spills

In light of the Tanker Safety Expert Panel's mandate to review and assess Canada's tanker safety system and to make recommendations to the Government of Canada on related matters, the Canadian Marine Pilots' Association (CMPA) welcomes the opportunity to provide observations on pilotage relevant to the second phase of this review, which deals with the safe navigation of tankers and other vessels carrying petroleum products in Canada's "arctic" waters (i.e., as indicated by the Panel, the waters north of 60 north latitude, including the Mackenzie River and Delta, Hudson Bay, James Bay and Ungava Bay).

Given the role of pilotage – to help ensure safe navigation – the CMPA's comments are focused on spill prevention, including spills from tankers and other vessels carrying significant amounts of petroleum products.

The pilotage regime established by the *Pilotage Act* compares favourably with anywhere else in the world and, in respect of northern waters, it is worth mentioning that the Great Lakes Pilotage Authority has delivered safe and efficient pilotage services for decades at the Port of Churchill, just south of 60 north latitude.

It is perhaps obvious but nevertheless of fundamental importance to note that the establishment of a pilotage regime in Canada's arctic waters is, in and of itself, not only a measure that asserts sovereignty but a critical component in any strategy designed to minimize ship-source spills.

Canada's excellent pilotage system is well-suited to help address the unique requirements of arctic navigation. To do so, however, will require a concerted effort on the part of government in collaboration with stakeholders in order to ensure the establishment of an optimized pilotage service that protects the public interest while meeting the needs of users at a reasonable cost.



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Specifically, questions related to the pilotage framework itself must be addressed, as must matters related to the recruitment and qualification of pilots and the ongoing provision of service by them.

Insofar as the pilotage framework is concerned, a substantial body of work must be undertaken so that decisions can be made regarding which arctic waters should be designated for compulsory pilotage and to which vessels, by size and type, the designation should apply. This work, which would include the commissioning of hydrographic surveys and the charting of waters, would best be accomplished under the leadership of a government-appointed coordinator. The ultimate deliverable from this exercise would be draft regulations setting out the compulsory areas and other requirements regarding pilotage.

Beyond the actual requirement for pilotage in arctic waters, lay questions about how the services are to be delivered. A strategy for recruiting and training a cadre of pilots to deliver the service must be developed and an appropriate administration structure be identified for the proper and most cost-effective management of the pilotage service.

The involvement of the entire marine stakeholders community in the examination of these questions will be essential for successful outcomes and, accordingly, would be a priority of the coordinator responsible for this undertaking. The Canadian Marine Pilots' Association looks forward to playing a constructive role in such an exercise.

Sincerely,

Capt. Simon Pelletier
President

Cc: Ms. Laureen Kinney, Assistant Deputy Minister, Safety and Security, Transport
Canada
Mr. Tim Meisner, Director General, Marine Policy, Transport Canada