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June 21, 2013

Tanker Safety Panel Secretariat
330 Sparks Street, Place de Ville Tower C (AAM)
Ottawa, ON K1A 0N5

Re: Oil Tanker Safety Expert Panel Review South of 60

Dear Captain Houston;

Please find attached our submission on the first phase of the **Oil Tanker Safety Expert Panel Review on the Marine Oil Spill Preparedness and Response Regime South of 60°N latitude**. The CSA appreciates the opportunity to submit written comment as well as meet with the Panel on this very important topic.

Executive Summary

The CSA assesses the current framework and overall capabilities as more than adequate for its fleet operations. Notwithstanding, there are some improvements that could enhance the protection of the marine environment and support sustainable shipping. These include:

1. Enhancing and sustaining peripheral services provided by the Canadian Coast Guard and Environment Canada, including renewing a world-class ice-breaking service; and
2. Providing flexibility in a response capability that addresses unique circumstances where the risk justifies an increased capability. The cost of such capability should be borne by the potential user(s) of such capability.

The Canadian Shipowners Association and its Fleet

The Canadian Shipowners Association represents Canadian-flagged short sea shipping vessels which trade primarily in the Great Lakes, St. Lawrence Seaway, Coastal and Arctic waters. With over eighty vessels, the membership is innovating and has recently invested over seven hundred million dollars in fourteen new ships, thanks largely to the removal in 2010, of the import duty on new

vessels. The Canadian short sea shipping industry has an excellent safety record and is key to continental and international trade.

Discussion and Recommendations

The CSA and its members assess the current framework as satisfactory at ensuring the safe movement of oil and chemicals by tanker and tank barges through Canadian waters. In fact, as the system has evolved, its costs have decreased without a negative impact on response capacity as evidenced by the recent Gazette publication of an increase of only nineteen cents/tonne instead of the expected twenty-four cents/tonne.

While the CSA submits that the current regime and capacity in place for prevention, response and compensation from oil spills is more than adequate and has demonstrated a high level of performance, we do appreciate that there might be certain additional capabilities required regionally to address responses in specific locations.

Additionally, the CSA has identified a concern with respect to the degradation of peripheral services provided by the Canadian Coast Guard and Environment Canada. The Canadian Coast Guard has an aging fleet that urgently requires a comprehensive fleet renewal to continue offering preventative services and support during interventions; this capability includes ice breaking. Likewise, Environment Canada's Crisis Communication Team was highly regarded for providing scientific support for rapid targeting and action during events; the CSA is concerned that this capability has degraded over time.

Fundamental to the CSA position is the fact that the need for changes to the system has not yet been demonstrated with evidence. Any increases from the current 10,000-ton spill capacity should be validated with evidence and must be reflective of the true risk and not merely precautionary.

If flexibility is required, the cost of the flexibility should also bias the user(s) of the service and not be shared amongst the larger marine community. These discrete response capabilities should be operated and funded separately within the current equitable national environmental response regime.

Our industry is proud of its safety record; ship-source oil pollution is not a very large component of reported oil pollution and further, the Canadian-flagged fleet is a small subset of vessels. In fact, as of December 2012, the ECRC, which our membership is served by, had responded to two hundred and eighty-six spills over eighteen years, only four of which were Tier Two (over one hundred and fifty tons spilled). None of those spills were from ships but rather other transportation modes operating in the vicinity of shipping channels.

The Canadian Shipowners Association appreciates the leadership of the Government of Canada to protect the marine environment while growing a sustainable Canadian economy. Our membership is an active partner in these objectives and welcomes the opportunity to ensure appropriate and high-quality prevention and response regimes.

Yours sincerely,

A handwritten signature in black ink, appearing to read "R. Lewis-Manning". The signature is fluid and cursive, with a large loop at the end.

Robert Lewis-Manning
President
Canadian Shipowners Association