

City of North Vancouver • District of North Vancouver • District of West Vancouver

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

June 21, 2013

To Whom It May Concern,

Re: Strategic Review of Canada's Marine Oil Spill Preparedness and Response Regime

The North Shore Emergency Management Office conducts emergency planning for the City of North Vancouver, District of North Vancouver, and District of West Vancouver. These municipalities all have waterfront areas within Port Metro Vancouver and could be directly impacted if there was an oil spill within the waterway.

In developing 'world-class' preparedness and response requirements it will be important to know what criteria are being used and how and who these are compared to. This process should be transparent and reviewed on a regular basis and whenever there are changes in methodologies and protocols so that there is continual improvement in the process. This 'world-class' system should be fully funded by industry. It should not be downloaded to local government.

All emergencies start at the local level and there appears to be little if any outreach to Local Authority Emergency Management entities around this topic. It is recommended that you engage not just first response organizations but also municipal emergency management departments when reviewing criteria, levels of preparedness, training, exercising, and development of procedures that could impact our communities. Some municipalities do not have a pipeline or loading facility in their jurisdiction, but if there is a spill which escapes containment, it could have wide reaching implications.

The panel should closely review the regulated response capacity of 10,000 tonnes as this may be adequate for smaller spills but is completely insufficient for catastrophic failure of a vessel, or if there are multiple events. In addition, consideration should be made for the increase in all vessel traffic which increases the risk of ship to ship collisions. The current criteria for these response materials to be on site within 72 hours is absolutely inadequate within the inland waterways. This length of time will result in a greater impact area and longer recovery for the affected area. In Port Metro Vancouver area, there should be a documented standard that states these will be available and on site within 1-2 hours. Stashes of emergency supplies should be located along tanker routes and training provided to those who may end up being the first on scene. However, this should not be a down loaded responsibility to local authorities or first nations. Industry and transporters should be responsible for all costs associated with supplies, training and exercising as it is their hazardous product which may negatively impact the environment.

The Canadian Coast Guard should take the role of incident command during any emergency on the water. There will also need to be a shoreline site command (often ends up being the local authority) to respond to anything that impacts the shoreline. It will have to be determined how jurisdictions support each other so that there is no negative overlap and that their response actions align together. It is critical that communications protocols, equipment compatibility (i.e., most first responders in Metro Vancouver are on the E-Comm radio system while Coast Guard is not), and relationships have been established prior to any emergency. This can be done via engagement (education regarding the hazard), training, and exercises.

Please contact me at 604.969.7000 if you require additional information.

Yours Sincerely,

Dorit Mason, M.Sc., A.B.C.P.
Director