

GABRIOLANS AGAINST FREIGHTER ANCHORAGES (GAFA) SOCIETY

SUBMISSION: “LET’S TALK TRANSPORTATION PORT MODERNIZATION REVIEW”

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The following submission is from the Gabriolans Against Freighter Anchorages Society (GAFA). We are a provincially-incorporated society formed in 2015 to oppose establishment of five Capesize freighter anchorages proposed for the waters of Georgia Strait along the Gabriola Island northern coastline. Please contact us at: gafasociety@gmail.com

The current and proposed designation of freighter anchorages off the coastal communities of the Southern Gulf Islands of British Columbia highlights a significant gap in current port authority operations that must be addressed with the Port Modernization Review, namely the designation of freighter anchorages outside port waters. Anchoring freighters is a heavy industrial activity that must be contained within port waters or close to commercial or industrial lands.

The Federal Government of Canada states that it is committed to growing the economy and protecting the environment. That, in the 21st century, it is no longer appropriate to develop solutions that support industry at the expense of the environment or solutions that protect the environment but undermine economic growth. The 21st century solutions must grow the economy and protect the environment. The Port Modernization review provides an opportunity to do just that – implement changes to help ports grow the Canadian economy through increased trade while also protecting the environment. Only freighters taking on cargo at the berth are moving goods. Parked freighters are not moving goods. As a result efforts to reduce the number of times a freighter goes to anchor and the amount of time a freighter stays at anchor will increase cargo throughput and improve port productivity. Such efforts will help reduce the number of anchorages required to meet port demands which will help prevent the need for ports to find anchorages outside port waters. Containing freighter anchorages within port waters or close to industrial zones is essential to protect the Southern Gulf Island waters and communities from the severe and irreversible damage caused by freighters being anchored in Southern Gulf Island waters. To achieve the “win/win” scenario of protecting the marine environment and fragile coastal communities from irreversible damage while growing the economy through increased trade, Port Modernization will need to acknowledge the following:

1. That deep sea freighter anchoring is a heavy industrial activity that must be contained within port waters and industrial/commercial areas
2. That freighter anchorages cause irreversible damage:
 - (a) To fragile marine ecosystems (through anchor chain dragging that destroys forage fish and marine food chain; residual oil and other contaminant spills; risk of grounding or ship collision and subsequent catastrophic oil spills)

- (b) To coastal communities and economies dependent on the beauty of natural environments; pristine beaches and vibrant marine ecosystems for attracting tourists and residents
 - (c) To the quality of life of coastal communities through introduction of significant noise, light, air and water pollution that cannot be mitigated to any meaningful degree
3. That given the irreversible negative impact on coastal communities and marine ecosystems, freighter anchorages are a limited resource the use of which must be carefully monitored and controlled. If current anchorages used for legitimate business reasons (reasons that actually improve cargo throughput and port productivity) are not enough to meet port needs, additional anchorages must be found within port waters or near industrial zones only. They cannot be designated near areas that have been identified for protection from development and industry as is the case with the Southern Gulf Islands regions as documented in the Islands Trust Act of British Columbia.
 4. That freighter travel and burning of bunker fuel contributes significantly to greenhouse gas emissions. Fewer hours travelled will mean less fuel burned. As a result, anchorages must be located within port waters close to berth areas. Currently, bulk carriers anchoring in the Southern Gulf Island waters, outside Port of Vancouver boundaries, travel on average about 8 hours more than if they travelled straight from the open sea to port and then directly back to the open sea, as is the case with most container ships. By reducing or eliminating this outside-of-port anchorage activity, the burning of fuel (and consequential greenhouse gases and air pollution) could be reduced by up to 30,000 tonnes annually.
 5. That less time at anchor means less diesel fuel burned. Bulk carriers anchoring for more than 10 days account for about 60 percent of all anchorage usage. Freighters at anchor run generators 24 hours a day, seven days a week to provide power for lights and equipment, and to heat their bunker fuel. Reducing days at anchor will reduce greenhouse emissions

To achieve Port Modernization, Transport Canada must require ports to begin any analysis of need for freighter anchorages with the operating presumption that the port will conduct its operations within its own boundaries. Vancouver Fraser Port Authority (VFPA) respects that rule in its land-based operations, and should apply the same rule to water- based operations.

If a port, such as the VFPA, claims that it cannot fulfill its international marine trade obligations without the regular use of additional freighter anchorage sites outside of its own boundaries, Port Modernization will require the VFPA to prove it, by presenting evidence that:

1. It has identified and resolved chronic supply chain problems,
2. It has developed sufficient Port infrastructure, such as terminals, storage facilities and berths, to accommodate current and reasonably foreseeable bulk trade volumes,
3. It has implemented new technologies to maximize Port operations that would allow, for example, the loading of grain during adverse weather conditions, and increasing the number of anchorages within Port Authority waters, and
4. It ties anchorage usage to productivity.

If VFPA satisfies Transport Canada that, notwithstanding operating at a high level of efficiency as described above, it cannot meet Canada's international marine trade obligations with the anchorages available within Port Authority waters. Then Transport Canada may decide that it is necessary to authorize the extraordinary remedy of establishing overflow anchorages. But even here, the VFPA and the shipping industry ought to be required to justify each and every overflow anchorage sought.

In deciding how many overflow anchorages are justified and where they should be located, Port Modernization through Transport Canada must balance the interests of the shipping industry against other equally important values such as protection of the environment and the interests of affected First Nations and residential populations and their right to health, a strong economy, and quality of life. The Port of Vancouver's own Sustainability Report (2016) acknowledges the importance of working closely with communities to minimize the impact of port operations on surrounding communities. The 16 or 17 communities identified in the Port of Vancouver Sustainability Report do not include Southern Gulf Island communities currently impacted by freighter anchorages. It is appropriate that Southern Gulf Island communities not be included on this list as the Gulf Islands are on the other side of the Georgia Strait, are an archipelago of islands designated for protection under the Islands Trust Act and freighter anchorages should not be designated in Southern Gulf Island waters. Port Modernization must include requirements for ports such as the Port of Vancouver, to improve the utilization of anchorages within port boundaries and reduce the need for anchorages outside port waters and work toward reducing and ultimately eliminating anchorages designated within Southern Gulf Island waters.

GAFA fully understands the importance of shipping to the Canadian economy. We recognize that the efficient flow of commercial freighters in and out of the Port of Vancouver plays a vital role in Canada's participation in the global economy. Adding anchorages outside port waters, however, simply parks more freighters in longer queues at longer distances from the port adding to operational costs and undermining port productivity. Freighters at anchor outside of the port boundaries, for lengthy periods of time, are not moving goods.

The following are questions raised about the use of anchorages outside Port of Vancouver waters from the analysis of nearly 120,000 ship files over 10 years (information for analysis was provided by the Pacific Pilotage Authority):

- 92 percent of all freighter anchorage usage is by bulk carriers coming to the Port of Vancouver to load grain, coal and other bulk commodities.
- Over the past decade, according to Port of Vancouver annual reports, the export of bulk commodities has increased by about **40 percent**. Over that same period anchorage usage has increased by a startling **400 percent**.
- While container ships rarely anchor for any length of time, some 60 percent of anchorage usage by bulk carriers can be attributed to ships that stay for 10 or more days per Port visit.
- At least 75% of all anchoring occurs prior to the first trip to a berth in a visit - much of this could be excessive and unnecessary.
- Bulk carriers anchoring outside port waters in the Southern Gulf Islands travel on average about 8 hours more than if they went straight to port and straight back out to sea, as most container ships do. Calculations suggest they burn at least 30,000 more tonnes of fuel every year because of this extra travel. This is costly not only to the ship's bottom line, but also degrades air quality and aggravates global warming which, as we all know, is already having direct economic consequences.
- Bulk carriers pay hefty pilotage fees for each extra trip they make to and from Gulf Islands anchorages. These fees get passed on to suppliers of the cargo, such as Canadian prairie farmers.
- In its 2012 report, the Quorum Corporation, which monitors the handling of grain, found that: "As the number of vessels waiting increased, average loading time grew" (page70). This is evidence that congestion as a result of an increase in anchorage usage actually reduces productivity.
- Allowing freighters to anchor for free in the Gulf Islands for as long as they want undermines port productivity as it allows necessary improvements to the Port supply chain to be ignored or postponed.
- Finally, about half of that extra travel, or more than 6,000 hours per year, is through Southern Resident Killer Whale foraging areas, which contributes to the dire situation facing this threatened species.

The modernization of Canadian Ports must require ports to show discipline around the use of freighter anchorages and work to curtail this activity. Port authorities such as the Vancouver Fraser Port Authority are particularly well-positioned, both in terms of resources and capacity, to take a lead role in finding the solutions necessary to utilize freighter anchorages as efficiently as possible and reduce or eliminate the need for anchorages outside port waters.

Research identifies several possible solutions, including:

- Impose reasonable restrictions on how early freighters may arrive in BC's South Coast waters.
- Improve contracting practices to reduce long periods between date of freighter readiness and date of freighter loading.
- Continue with physical infrastructure improvements such as increased availability of rail cars; foul weather loading facilities at terminals; use of fixed mooring buoys inside the port to help alleviate the need for external anchorages.
- Adoption and expanded use of digital tools such as block chain and other supply chain management applications, to increase scheduling efficiencies and decrease wait times.

Anchored ships are unproductive ships. They are not moving cargo, they are simply burning fuel and incurring overhead charges which are undoubtedly passed along to the suppliers of their eventual cargo. While GAFA accepts that bulk shipping may never achieve the smooth efficiency of the container system, ships sitting at anchor for such long periods of time is a clear indicator of an inefficient supply chain.

The President of the Chamber of Shipping of BC, wrote to Transport Canada on August 9, 2017 to say that "The current framework for anchorage operations for the South Coast of British Columbia is not optimized for efficient commercial operations and results in unnecessary costs, delays, unpredictability, and impacts on certain coastal communities." He also acknowledged that the anchorage issue is having negative impacts on coastal communities.

Port Modernization is an opportunity to implement needed change in the oversight of port operations. Changes that will ensure freighter anchorages are contained within port boundaries or close to industrial areas. Such oversight will help protect fragile marine ecosystems and coastal communities from the intrusion of heavy industrial activity from port operations as a result of designated freighter anchorages and it will also help maintain and increase cargo throughput in support of growing the Canadian economy

Thank you for your attention to this matter. Please contact us at

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