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May 16, 2014

Kugluktuk

Tanker Safety Panel Secretariat
Transport Canada
330 Sparks Street (AAM)
Ottawa, Ontario K1A 0N5

Bathurst Inlet
Kingaok

Sent via email: tsep-cesnc@tc.gc.ca

Bay Chimo
Umingmaktok

RE: Additional comments on Canada's Ship-source Oil Spill Preparedness and Response Regime, Phase II

Cambridge Bay
Ikaluktutiak

Dear Sirs,

The Kitikmeot Inuit Association (KitIA) would like to thank the Tanker Safety Expert Panel (the Panel) for the opportunity to contribute to Phase II of the Panel's review via teleconference on May 12, 2014. As the Panel is aware, prior to the teleconference, the KitIA assessed the Panel's first report, *A Review of Canada's Ship-Source Oil Spill Preparedness and Response Regime – Setting the Course for the Future*. The KitIA found the report very informative, and we agreed with most of the recommendations. The KitIA also found our teleconference discussion to be positive, and we thank the Panel for their interest in Inuit concerns about tanker safety.

Gjoa Haven
Okhoktok

Taloyoak

Kugaaruk

In addition to the comments and suggestions addressed during the teleconference, the KitIA is submitting the following comments as we may have overlooked them, or we may not have clearly or fully articulated them:

1. Oversight and enforcement (page 23 of the report) would be critical in the Arctic. The KitIA suggests that, if a Response Organization (RO) cannot implement its plan, then the enforcing institution (Transport Canada, as recommended by the Panel) should also have the capacity to assign a different RO to implement the plan, while charging the cost(s) back to the original RO.
2. Page 24 of the report states "*Currently, the Response Organizations are only responsible for oily waste until they have collected it and brought it to shore. At that time, it becomes the responsibility of the polluter to make arrangements for its disposal, in consultation with the province or territory involved*". Due to a combination of remoteness, the lack of infrastructure, and/or appropriate facilities in Arctic communities, oily or hazardous and noxious substance (HNS) waste could potentially become a substantial liability to the people of the Arctic. The KitIA suggests that any and all plans must consider and lay out steps for the proper and complete removal of oily or HNS waste from the Arctic (as it may apply to Recommendations 10 through 13).
3. The Arctic is a very sensitive and harsh environment. It is also a location where people rely substantially on the land for their family's subsistence. As such, the requirements for quick response times, coordination, preparation, and ecosystem understanding may



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- be more critical in the Arctic than south of 60°. The KitIA supports the Panel's recommendations listed under section 6. *Leadership and Stewardship* (Pages 32-38), with the addition that Inuit should be involved in preparedness planning in the Arctic. Inuit should also be consulted about the location and sensitivity of ecosystems and wildlife.
4. During the teleconference, the KitIA mentioned Inuit concerns about tanker safety in the advent of two ships running aground in the Kitikmeot region (a passenger cruise ship east of Kugluktuk in August 2010, and a fuel tanker near Gjoa Haven in September 2010). There was another event that we neglected to mention: in August of 2006, during Kugluktuk's annual fuel resupply, approximately 1,000 litres of diesel fuel was discharged into Coronation Gulf¹. Although the spill occurred in the ocean, the event caused many Inuit to become concerned about safety at fuel transfer stations, and the KitIA would encourage the Panel to investigate this issue.

The KitIA would like to thank the Panel for their excellent work thus far, and we look forward to the Phase II report and recommendations. Should the Panel have any additional questions for the KitIA regarding this review, please free to contact us at the telephone above or via email (Tannis Bolt projofficerkia@qiniq.com, or myself ltorretti@qiniq.com).

Best regards,

Luigi Torretti
Senior Environment Officer

cc.: KIA: Paul Emingak, Geoff Clark, Tannis Bolt

¹ <http://www.cbc.ca/news/canada/north/ntcl-fined-10-000-for-spilling-diesel-into-arctic-waters-1.755224>
http://www.nunatsiaqonline.ca/archives/2008/807/80711/news/nunavut/80711_1366.html