



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

June 19, 2013

**Re.: SLSMC inputs to the Review of Canada's Marine Oil Spill Preparedness and Response Regime**

I would like to thank Transport Canada's Tanker Safety Expert Panel for the opportunity to share the St. Lawrence Seaway Management Corporation's (SLSMC's) observations and comments on May 15<sup>th</sup>, 2013, regarding Canada's Marine Oil Spill Preparedness and Response Regime.

The SLSMC manages the St. Lawrence Seaway's Canadian locks and channels on behalf of the Government of Canada. As presented on May 15<sup>th</sup> to the panel, the SLSMC believes that the current Oil Spill Preparedness and Response Regime (with a regulated preparedness capacity of 10,000 tonnes) meets the needs of the inland and ocean fleets transiting within the St. Lawrence Seaway's locks and channels, and will continue to do so for the foreseeable future. The Regime's provisions for oil spill prevention, intervention, and remediation are sufficient to cover all aspects of vessel transits within the SLSMC's jurisdiction.

However, the SLSMC submits the current Regime can benefit from a series of minor improvements. The following is a summary of the points discussed during our meeting with the Panel.

- (1) **A clearer definition concerning which agency is to serve in the lead role, and its roles and responsibilities:** In the event of a spill, identify which agency is responsible to take the lead, including:
  - the geographic bounds the lead agency is responsible for;
  - when the lead agency must respond (triggers); and
  - in what capacity the lead agency will act in order to ensure that the roles and responsibilities of all other agencies are clear to everyone involved.
  
- (2) **A process for the escalation of management of an emergency situation:** Establish a process for the transfer of the lead role from one agency to the next, including an outline of the factors that will trigger the transfer, as well as directives concerning the roles and responsibilities of the various other agencies that may be working together to bring about an effective response.
  
- (3) **An established communications plan for a multi-agency response:** Establish a process by which the various agencies can efficiently communicate internally, one with another, during a response in order to reduce the inefficient use of resources (e.g. where one agency has to repeatedly answer the same question, posed by other agencies, due to a lack of a central

information repository). The process should also provide clear directives on which agency will take the overall lead on external communications (media communications and public relations) and how the agencies should work together to provide an integrated message to the public.

In terms of funding, the SLSMC agrees that responsibility to pay for any cleanup should remain with the polluter, when commercial interests are at play. The SLSMC believes that the development, provision of infrastructure, and testing of the response regime as well as the monitoring of response activities and the enforcement of all requirements, should be federally funded. Research and development related to oil spills, which are crucial to the preparedness for such a response, should also be federally funded. For example, initiatives such as Environment Canada's multi-stakeholder Regional Environmental Emergencies Teams (REET) are vital to ensuring an effective and timely response to spills as they can provide environmental advice with respect to environmental priorities, resources at risk, and the most appropriate cleanup methods and strategies.

To further enhance the current response Regime, the emergence of liquefied natural gas (LNG) as a ship fuel or as a transported cargo should be taken into consideration. As more stringent controls on Sulphur Oxide (SOx) and Nitrogen Oxide (NOx) emissions are expected in the near future, ships may opt to use LNG instead of adopting technological methods to "scrub" their emissions. Following the recent announcement by Shell concerning its plans to build a small LNG plant in Sarnia (Ontario) with a planned capacity of 250,000 tonnes per year, and the expected conversion of some of the U.S. bulk carrier fleet to utilize LNG as the main propulsion fuel, there is an increased potential for LNG to be out on the Great Lakes and the St. Lawrence Seaway, and therefore a greater need to be prepared in the event of a vessel incident.

In conclusion, I would like to again thank the Panel for its diligence in carrying out the hearing, and for the level of interaction permitted.

Regards

A handwritten signature in black ink, appearing to read 'Jean Aubry-Morin', with a stylized flourish at the end.

Jean Aubry-Morin

Vice President, External Relations  
The St. Lawrence Seaway Management Corporation  
202 Pitt Street,  
Cornwall, ON  
K6J 3P7  
Tel: 613.932.5170 x3249,  
Email: [jaubrymorin@seaway.ca](mailto:jaubrymorin@seaway.ca)