

A submission to the federal government

March 13, 2003

Tom Morris
Environmental Protection
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Ottawa, ON K1A 0N8

Dear Mr. Morris,

Please accept our comments on the above guidelines. The Georgia Strait Alliance (GSA) is made up of approximately 50 member groups and many hundreds of individuals around the region with a common goal: to protect and restore the marine environment and promote the sustainability of Georgia Strait, its adjoining waters and communities. We recognize that “sustainability” must encompass not only a healthy environment, but also social factors such as human health and long-term economic sustainability for coastal communities.

General comments:

- The government should create environmental regulations for the cruise ship industry rather than guidelines that are unenforceable.
 - The cruise ship industry can have such a considerable impact on the ecological health of our waters. Even the best guidelines offer no protection if everyone concerned does not abide by them. Detailed and enforced regulations in the same spirit as these guidelines would be much a more effective and rational way to protect the environment from potential impacts of cruise ship practices
- The current language in these guidelines is too weak.
 - Wording such as “should” or “shall” should be replaced with “must” and “will”. The current wording encourages but does nothing to insist that these measures are anything than suggestions.

Our specific concerns with the draft guidelines:

- Preface section: The assumption that the Fisheries Act, Canadian Shipping Act, the Arctic Waters Pollution Prevention Act and the Canadian Environmental Protection Act are adequate to address environmental issues related to cruise ships is flawed.
 - We do not agree that these Acts are adequate in offering the kind of environmental protection necessary to minimize the impact of cruise ships on the environment. As an example, in its current form the Fisheries Act is often unenforceable, making the Act far

less than adequate. We recommend that these guidelines be turned into enforceable regulations that on their own will offer the protection that these other Acts do not.

- Commitment section:
 - This section is encouraging, but offers no incentive for the cruise ship industry to undertake initiatives to reach these goals. Therefore, unless written as regulations, these commitments are essentially meaningless.
- Section 7.1: Discharge of silver should be prohibited, not simply minimized
 - All wastes from photo processing on cruise ships should be treated as hazardous waste and landed at appropriate facilities onshore. We recommend removing the option to discharge ANY silver into the marine environment.
- Section 8.2: Proper disposal services for dry-cleaning waste fluids and contaminated materials must be available onshore
 - Encouraging these products to be landed ashore is admirable, but unless the proper disposal procedures are regulated and available on shore, the end result may still be contamination of our environment either by improper disposal on land or at sea.
- Section 9.4: Soy based, non-chlorinated ink product use should be mandatory, not simply “whenever possible”.
 - These non-toxic alternatives are available and their use should be mandatory, not optional.
- Section 13.6: Battery collection guidelines should also apply to passengers.
 - The use and disposal of all types of batteries is an issue for both staff and passengers, therefore protocols to ensure proper disposal by passengers should be implemented.
- Section 14 (2) and 14 (3): Discharge limits should be 5ppm for both internal and inland waters.
 - Since levels of oily wastes can be measured to at least 5ppm, we recommend that this standard be imposed for inland and internal waters. For relatively enclosed, estuarine areas such as Georgia Strait, the impacts on the marine environment of the release of bilge and oily water residues are very serious and there is no reason to allow greater contamination of these waters than of inland freshwaters.
- Section 18: Except in emergency situations, grey water should never dumped in inland or internal waters.
 - The current recommendation to limit the dumping of grey water to 4 nautical miles offshore is an arbitrary limit that does not adequately protect enclosed waters such as Georgia Strait, which is approximately 16 nautical miles wide

- The guidelines should also indicate that the current systems used to collect grey water should not be used to dispose of any substances that are not generated at the system source, or for the disposal of any toxic or oily substance.
- Section 19: The discharge of black water must be subject to all applicable regulations, including the new Vessel Source Sewage Pollution Prevention Regulations currently being developed.
 - In addition we recommend that effluents not exceed 250 MPN faecal coliforms in any internal or inland waters, or elsewhere within 3 nautical miles of land. The volume of discharges from cruise ships is of huge concern in enclosed waters such as the Strait of Georgia and the Inside Passage. We believe the notion that disinfected or comminuted sewage (as per MARPOL Annex IV) is appropriate is invalid in any enclosed or estuarine waters.
- Section 19(5): Black water should NOT be discharged in Arctic shipping control zones.
 - There is inconsistency in these guidelines since oily bilge water is not to be dumped in these zones, yet black water can be. We recommend that neither substance be discharged in these areas.
- Section 20: Promote source control as well as improvements in wastewater treatment technology.
 - Although advanced technology has proven effective in reducing faecal coliform levels, technology cannot be relied on to remove all contaminants from sewage. Other components of sewage, such as chemicals, pharmaceuticals and toxic chemicals must be reduced or eliminated through source control.
- Section 21: Training of staff and education of passengers should be mandatory.
 - It is important that both staff and cruise passengers be made aware of the impacts their actions are having on the environment. They must therefore be given the information so they can take responsibility for their actions
 - All training should be done using government approved or independent material, not simply cruise ship industry information.
- Section 22(1) and 22(2): All cruise ships should be retrofitted to meet the requirements of Annex VI of MARPOL.
 - As written, most cruise ships will not meet these requirements nor are they being encouraged to do so. This means that most ships will continue to pollute the air in our harbours, ports and along our waterways.
- Section 23: All ships should bear no organotin compounds on their hulls or external parts or surfaces past December 31, 2006.

- Section 26: All products discharged overboard should be logged.
 - To allow accurate monitoring of wastes of any kind, anything discharged into the marine environment or landed onshore should be logged. We recommend this system be part of a more comprehensive reporting/monitoring process. The current guidelines will be of little use unless they are backed up by mandatory reporting and monitoring systems which provide incentives to abide by the recommendations.

We believe that these guidelines offer some good starting points for the development of cruise ship environmental protection regulations. However, until the guidelines are turned into regulations, they can provide little protection for the marine environment from the impacts of the cruise ship industry. We strongly recommend the creation of regulations and that these be harmonized with U.S. regulations to create a comprehensive environmental protection program.

We thank you for your attention to this matter and look forward to your reply.

Sincerely,

Laurie MacBride
Executive Director

cc: Hon. David Collenette, PC, MP
Hon. David Anderson, PC, MP
James Moore, MP
Bev Desjarlais, MP