

## Letter of Objection

**17 March 2004**

Dixie Sullivan and Sean Standing  
Disposal at Sea Program, Environment Canada  
#201 – 401 Burrard St .  
Vancouver , BC V6C 3S5

Dear Ms. Sullivan and Mr. Standing,

Re: Proposed ocean dumping of Boeing 737

We write in support of the Comox Valley Watershed Assembly and our Comox Valley members and other local citizens who have contacted our organization to express their opposition to the proposed dumping of a Boeing 737 off the Comox bluffs.

As you know from our previous correspondence, our organization has long been opposed to the deliberate sinking of old ships in our region as artificial reefs. We see the proposed dumping of this airplane as equally wrong and contrary to sound ecological management, pollution prevention and prudent fisheries management.

We refer you to the many serious concerns outlined in the [letter sent to you by the Comox Valley Watershed Assembly earlier this month](#), which was cc'd to us. We concur with these concerns and would add the following:

1. The deliberate sinking of disused ships and aircraft contradicts the federal Fisheries Act in that it involves the release of deleterious substances into waters frequented by fish. It is also inconsistent with the London Convention of 1972 aimed at preventing further pollution at sea.
2. Dumping waste materials into our coastal waters, especially when these materials are of primarily metallic origin and easy to recycle, runs counter to the long-term vision of the conservator society that Environment Canada has rightfully been promoting through its public education programs.
3. There is no scientific agreement that artificial reef construction is beneficial to the marine environment, and indeed, there is much scientific opinion that it can actually be harmful, particularly when reefs are made from "materials of convenience" (eg. old aircraft) rather than being designed for the specific location and for enhancement of specific species and taking into account factors such as the number of chambers, chamber size, optimum reef size, design, substrate, depth vs. distance offshore, spatial arrangement/configuration and materials, etc. At the very least, we are altering marine habitat by sinking ships.

4. The dumping contradicts to the precautionary principle, i.e., that where harmful effects are likely, the proposed action should not be allowed, even where there is inadequate or inconclusive scientific evidence to prove a conclusive link between it and the effects.
5. We question the unsubstantiated claim by the Artificial Reef Society of BC that these dive sites bring “millions” into local economies, as we have seen no economic studies to back this up. We believe the if our coastal communities want long-term economic benefits, we need instead to ensure the health of our marine ecosystem, upon which existing industries (commercial and sports fisheries, shellfish, tourism and recreational diving) depend -- rather than put these at risk by altering the underwater habitat and introducing potential new sources of pollution.
6. The public consultation process on this application has been wholly inadequate, as outlined in the Comox Valley Watershed Assembly’s letter.

In conclusion, we agree the Comox Valley Watershed Assembly and other Comox Valley citizens who oppose the dumping of this aircraft in their local waters, and urge you to reject this application.

Sincerely,

Laurie MacBride  
Executive Director, Georgia Strait Alliance

cc. Hon. David Anderson, MP, Minister of Environment  
Hon. Geoff Regan, MP, Minister of Fisheries  
Don Fast, Regional Director General, Environment Canada  
Paul MacGillivray, Acting Regional Director, DFO  
John Pringle, Marine Environment & Habitat Sciences, DFO  
Chief and Council, Comox Indian Band  
Mayor and Council, Town of Comox  
Chair and Board, Regional District of Comox-Strathcona  
David Essig, Chair, Islands Trust  
Comox Valley Watershed Assembly