

A Submission to the Canadian Coast Guard

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The Georgia Strait Alliance is a coalition of about 50 organizations (with a combined membership of 150,000) and several hundreds individual members from communities all around the Strait of Georgia, working to protect, preserve and restore the marine environment and ecological well-being of Georgia Strait and its adjoining waters. Our member organizations include labour, environmental, aboriginal, community and recreational groups and small businesses.

As well as speaking to you as Executive Director of the Georgia Strait Alliance, I also speak as someone who has been involved in recreational boating on this coast for over 35 years. My experience on the water has included a stint as co-owner of a commercial salmon troller, and I currently own and operate a small cruising sailboat. My familiarity with and affinity for our waters are qualities that I share with a great many of our organization's members. These members represent a wide diversity of interests, including many people who spend a great deal of time on the water: commercial and recreational fishermen and guides, shellfish growers, kayakers, recreational boaters and others.

While we are glad for the opportunity to address Coast Guard, we find it at the same time disturbing that we should have to do so again, so soon after so many individuals and organizations - including our own - addressed your public hearings in January regarding lighthouse de-staffing. At that time it was made abundantly clear that British Columbians from every walk of life strongly oppose the de-staffing of west coast lighthouses - and yet despite this overwhelming opposition, Coast Guard officials have continued to develop an implementation plan for de-staffing, telling us that it's not a matter of if, but only when, de-staffing will take place. It is hard for us to trust that the Coast Guard "consultation" process is genuine when public concerns are so blatantly ignored. It is difficult for us to see the consultation process as real or significant when, as in the present situation, meetings are being held for such a limited amount of time and in only four coastal communities. Nevertheless, we offer these comments in good faith and in the hope that they, along with the comments you receive from other individuals and organizations, will be taken seriously.

In addition to lighthouse de-staffing, our members oppose any cuts to aids to navigation, search and rescue and/or environmental response. These programs are essential and we believe that it is not in the public interest to decrease the levels of service in any of them. We cannot support reduction of services where it will likely result in a decrease in public safety or environmental protection. While we are happy to take part in consultative processes to discuss the importance of Coast Guard services, we are not prepared to participate in consultations if all we are being asked to do is help decide which of these essential services should be cut. To ask, as you have on your "Client Survey", which of the three Coast Guard services (marine navigation services, search and rescue, or environmental response) "do you make the most use of, or do you have the greatest interest in" - without giving any option for someone to say that all three are equally important - is analogous to asking us which of our legs we'd rather have chopped off, and is clearly unacceptable.

As we noted in our submission on lighthouse de-staffing, the number of boats in our coastal waters is growing steadily. According to a 1992 report compiled by Price Waterhouse for the BC Marine Trades Association, British Columbians own more than 400,000 boats and the recreational marine industry generates 22,000-person-years of employment annually. Marine tourism alone was worth \$247 million and accounted for nearly 6,000 person-years of employment in 1989, the last year for which these statistics are available.

An average of 400,000 sports fishing licences are issued annually according to Department of Fisheries and Oceans (DFO) statistics. A 1990 National Survey of Recreational Fishing in Canada showed that \$1 billion is spent every year in the BC sports fishing industry alone.

Pleasure boat traffic continues to increase steadily; in 1993, 253,000 US citizens entered BC waters by boat, an increase of 26% over a four-year period. These figures almost certainly err on the low side, as they are a few years out of date and do not include kayakers, the fastest-growing segment of the recreational boating population.

The number of recreational boaters in British Columbia will continue to grow as the population of the Georgia Basin increases. The region's population is expected to double over the next 35 years, and our waterways can only become more crowded as this growth takes place.

In the commercial sphere the number of people and vessels using these waters is also considerable. Department of Fisheries and Oceans statistics for the fiscal year 1992-1993 show that there were almost 6,000 licenced commercial fishing vessels operating on the west coast with almost 20,000 licensed commercial fishermen working on these boats. Add to the almost half-million people using our waters for sports and commercial fishing all of the other vessels - ferries, cruise ships, tugs, tankers, military ships, freighters etc. - and we begin to see how busy these waterways are.

Along with the increase in marine traffic there has been a corresponding increase in marine accidents: from 66 vessels in 1989, to 85 vessels and 49 deaths in 1992. Yet despite the increase in marine traffic and marine accidents, instead of increased spending on search and rescue and emergency services, the Coast Guard's budget has experienced a 12% cut over the past five years, with plans for continued cuts. Previously we were told that these cuts would be approximately 3% annually through 1998; now we are told they are to be 25% over the next three years. Figures that have been mentioned publicly range from \$49 million, to \$100 million, to \$180 million in cuts. Whichever is the truth, these cuts are not acceptable so long as they are in essential program areas such as navigational aids, lighthouses, search and rescue or environmental response.

Search and rescue in potentially life-threatening situations should be among the Coast Guard's highest priorities, and rather than cuts, needs more resources. If cost savings are the issue, there are almost certainly areas where organization and efficiency can be improved without compromising public safety. For example, in well-populated areas such as the Gulf Islands and southern Strait of Georgia, more reliance can be placed on commercial operators rather than sending Coast Guard craft to assist boaters who are stranded but not in any immediate danger. A commercial tower told me about two very recent incidences of what he sees as wasteful spending, where Coast Guard vessels were sent to assist boaters

with dead batteries or no fuel, who were in no immediate danger, when the skipper had already agreed to accept commercial assistance and the towboat was on its way. In one of these incidents, the Hovercraft arrived on the scene at the same time as the commercial tower, and in the other, two Coast Guard vessels were dispatched to deal with a sailboat that was becalmed and unable to use its engine, even though the commercial operator made it clear to Vancouver Coast Guard Radio that he was available. (Ironically in the latter case, a wind came up and the boat was able to sail away before the Coast Guard vessels arrived). The same operator has also complained about an apparent policy that is now seeing Coast Guard personnel in Zodiacs escorting the commercial tower and rescued boat into safe harbor even in calm weather when the towboat has the situation under control and requires no assistance. His advice to Coast Guard, if you are serious about saving money, is to "stop over-reacting" and to let the commercial sector look after all non-life-threatening situations.

This is not to imply, of course, that the Coast Guard should not be responding to the serious calls. In more isolated areas where commercial operators are not always available on a consistent or reliable basis and where the weather and sea conditions are often dangerous - places like Port Hardy, Bamfield, Bull Harbour, Tofino and the central coast area - the Coast Guard is providing an extremely important service and probably operating at under capacity due to having inadequate resources. While there will always, of necessity, be a reliance on assistance from commercial fishboats, military vessels, Fisheries vessels and volunteers, the Coast Guard's role is essential and should be not only maintained, but strengthened in order to provide adequate resources.

Some additional costs could be recouped by setting minimum safety standards for pleasure and commercial vessels, and if a rescue by Coast Guard occurs as a result of the vessel owner's negligence in those areas, requiring that some compensation be paid back to the Coast Guard.

In addition, fines for violations of safety standards could be increased, and the federal government should ensure that when fines result from Coast Guard investigations, that these fines go to the Coast Guard rather than into general revenue.

When our organization sent out a memo to yacht clubs and other marine-related organizations regarding pending cuts and urging attendance at these meetings, Mr. Dancer was very quick to reply and to dispute some of our statements. Among other things, he said (regarding our statement that, as reported in the Vancouver Sun on March 30/95, consideration was being given to removal of up to 75% of navigational buoys):

"I personally know of no thought being given to the removal of 75% of the navigational buoys universally. What I do know is that within the Marine Advisory Board, a board made up of representatives of ALL [his emphasis] major client groups, the following are the facts:

For commercial vessels in a particular area of the country it was estimated that 75% of navigational buoys used by large commercial vessels could be removed where vessels would be equipped with an electronic charting system (ECDIS) and Differential Global Positioning System signals would be used...

I would say to you that this does not imply that Coast Guard is looking to remove 75% of navigational buoys universally as your fax implies."

While Mr. Dancer's comments should give me some assurance, when I compare them to the text of the Coast Guard's new "National Marine Strategy" I am not so sure. Recommendation 24(c) states:

"It was pointed out to the committee by a number of users that recent advances in navigational technology based upon satellite technology (DPGS) and computerized electronic charting (Electronic Chart Display Information Systems) and automated dissemination and surveillance systems will mean that within five to seven years 80% of the current navigational aids will be redundant. The committee was told that later this year a public/private project to demonstrate this will commence in the St. Lawrence River.

Through what we heard, we think there is great potential for significant cost savings by using the new technology to the fullest extent possible. When this has been achieved, then consideration should be given to commercialization of the operation and the maintenance of what is left, which will be the essential navigational system. Once the unnecessary costs and services are taken out of the system, the users will be prepared to pay their fair share";

and Recommendation 25 urges the Coast Guard and users to:

"...proceed jointly as rapidly as possible to reduce the number of aids to navigation through the introduction of new aids to navigation technology and equipment..."

To me, this sounds like removal of navigational aids and does little to reassure our members that fixed navigational aids will remain intact. We are told that 80% of navigational aids will be redundant in five to seven years and that the number of navigational aids should be reduced rapidly. Is Mr. Dancer advocating that the government should, instead, retain what it sees as a "redundant" capacity?

As for his statement that the Marine Advisory Board (MAB) is made up of representatives of ALL (bolded and underlined in his letter) major client groups, we have to question this assumption and therefore the inference that the Board has the ability to consider all relevant information and viewpoints. To our knowledge there is no representative from any west coast environmental organization on the Board. Last week the MAB held the last of a series of four consultative meetings across Canada on proposed changes to the Pilotage Act. Since the work of BC coastal Pilots is intimately linked with marine safety (and thus with prevention of environmental disasters such as major oil spills), we felt it logical and proper that there should be environmental representation at the Vancouver meeting. As the only non-governmental organization that addressed the federal Legislative Committee on Bill C-121 (changes to the Canada Shipping Act) in Ottawa in June 1993, and as an organization that has been involved continuously on the provincial level with oil spill prevention and response issues over the past five years, Georgia Strait Alliance had an obvious interest in being there and some measure of expertise to offer. Eighty people were invited to participate in the meeting - but when Georgia Strait Alliance, along with one of our member groups, the Fraser River Coalition, indicated that we wished to attend, we were told

there was no room. Neither does it appear that there was "room" for any other environmental organizations, as none were on the invite list.

Removal of fixed navigational aids makes no sense whatsoever to our members. The BC Shellfish Growers' Association, one of our member groups, are concerned that the loss of navigational aids would be dangerous for shellfish growers working on the water during winter nights when visibility is not always good. Since the boats that they work out of are generally small, open skiffs and shellfish farms are, for the most part, small commercial operations, growers are extremely unlikely to be in a position to equip their boats with the latest in DPGS and electronic charting systems.

Besides, for small boats - which make up the majority of boats on our coast - these systems may never prove adequate. According to one of our members, an extremely experienced recreational sailor who has used DPGS and electronic charting on a 50-foot sloop outfitted with a full range of the latest electronic gear, these new systems do not offer the accuracy necessary to skirt dangers at close range. They are not precise enough, he said, to permit safe navigation in confined waters (such as the many passages in the Gulf Islands or Broughton Archipelago, to give just two local examples). While DPGS - even if the average recreational boater could afford to buy and maintain it - is an improvement in accuracy over GPS, it can still sometimes have a position error of 100 yards or more and there is no way to detect this error by looking at the display. Therefore in order to be safe, sailboats working their way upwind in confined waters must tack far short of an unmarked obstruction in order to be safe. This will create, at best, increased inconvenience, and at worst, increased danger of collision as sailboats make more frequent and unexpected manoeuvres in order to give these obstructions wide berth in busily-trafficked waters.

It's also important to remember that electronic gear breaks down and needs repair. So long as I have my eyes to rely on, when my autopilot breaks, I can hand-steer, and when my depth sounder stops working I can use a lead line. But if my electronic navigation system malfunctions and there are no fixed navigational aids in place, I'm in trouble. This could have a severe economic impact on the recreational boating industry of BC, as many people may elect not to risk such danger either by staying close to their home port, or perhaps giving up boating altogether.

Experienced sailors say that British Columbia's coastal waters are some of the most challenging in the world. Large tides, strong tidal currents, narrow passages, a myriad of shoals and reefs, and weather that can change several times in a single day make this coast hazardous enough for navigators without the loss of the navigational aids they depend on. Ask any sailor which they'd rather trust: a piece of software tied into an electronic positioning system of unknown accuracy, or their eyes - and the answer is clear. Even if all the commercial ships in Canadian waters are using DPGS and electronic charting seven years from now, the need for reliable fixed navigational aids will remain.

So why is a body charged with protection of marine safety placing the public in danger by suggesting so ludicrous a scheme as removing fixed navigational aids?

Environmental response is also an essential area of service for which cuts should not be contemplated. The potential economic impact from spills of oil and other hazardous cargo are much greater than the

cost of providing this service and have a potential impact on all British Columbians through loss of tourism, fisheries, and recreational value. Damage to the eco-system from an oil spill can be severe and long-lasting.

The death count shortly after the Exxon Valdez spill (bearing in mind that retrievals represent probably only 10-30% of the total that died) included: 4000 sea otters, 345 seals, 500,000 murrelets, 1000 adult eagles and a great many invertebrates and intertidal creatures. The spill upset the ecological balance of the entire Prince William Sound area and set off chain reactions which may not show their full impacts for years. It rendered some habitat sterile and lowered reproductive capability of many species.

Biologists estimate that some species may recover from the spill in 20-70 years, but they admit they do not really know how long it will take. The toxic impact of oil in bays and inlets may poison marine life well into the next century.

Some of the lingering impacts of the spill were discussed at a February 1993 scientific symposium in Alaska. Harbour seals continue to disappear at alarming rate. Pink salmon, harlequin ducks and herring are having trouble reproducing due to oiled intertidal areas, functional sterility, and genetic defects caused by the spill. Common murrelets are unable to mate. Mussels trapped beneath beaches continue to contaminate sea otters and other foragers. Thirteen killer whales have disappeared from the sound's resident pod since last count in 1988; to lose so many so quickly is unprecedented.

Effects have been found in wide range of organisms, including brain damage, suppressed immune systems, reproductive failure, genetic damage, structural deformities such as curved spines, lethargy, lowered growth rates and body weights, altered feeding habits, reduced egg volume, eye tumours, increased number of parasites, liver damage and abnormal behaviours.

Can it happen here, and what would be the impact if it did? Oil spill specialists have agreed that major spills (ie. more than 10,000 barrels) can be expected in the Georgia Basin once every 20 years. The Fraser River estuary - an essential fish nursery area on which our province's salmon industry depends - is only 15 to 60 km from the four largest tanker terminals in BC and Washington. So far we have been lucky - but we are overdue for a spill. Officials tell us it's not a matter of if, but when.

When a major spill does occur within the Georgia Basin, we can expect it to have very grave consequences if it is not contained immediately. Oil drifting from a spill into any of the estuaries of the region could, depending on the time of year, wipe out valuable salmon runs. Aside from that, it could result in impacts lasting more than a decade due to the difficulty of cleanup and the persistence of oil in mud and eelgrass.

Adding to the severity of the impact would be the fact that our relatively protected inside waters are slow to flush and lack the weathering action found on the exposed west coast. A single strong tide would push oil through the area's many channels, and within a few days beaches from Port Angeles, throughout the San Juans and Gulf Islands, all the way north to Gabriola Island - and perhaps much further - would almost certainly be coated in oil that would be extremely difficult, if not impossible, to remove. Obviously any environmental response needs to be immediate, decisive and well-coordinated,

and therefore we do not believe it makes sense to consider any cuts to the Coast Guard's environmental response programs.

If the goal is to save costs, there is an easy solution that the government could take - one that was recommended in 1990 by the federal government's own Brander-Smith report: to immediately impose a levy of \$2 per tonne on all oil and oil products transported in Canadian waters, and to pay this into the Ship-Source Oil Pollution Fund. There is a clear precedent for this: between 1973 and 1976, a levy of 15 cents/tonne was imposed on all oil shipped in or out of Canada in order to provide compensation from oil spill damage from oil tanker/barge accidents. The balance in the fund was about \$210 million based on accrued interest since 1976. No levy has been collected since then, although the Minister of Transport has the statutory authority to impose one. If such a levy had been imposed in 1993, it could potentially have raised over \$12 million that year alone.

The province has also recommended that the levy be reinstated, and we agree. We believe that the public would support such a move. In a recent public survey carried out by the BC Ministry of Environment, Lands and Parks, respondents put oil spill prevention and response at the top of their list of environmental concerns. Nowadays consumers are enlightened enough about the importance of our marine and coastal environment to accept having to pay the few extra pennies that it would cost at the pump.

In summary, we oppose cuts to any of the three areas of service being considered during these consultations. Along with staffed lighthouses and compulsory Pilotage, we believe that search and rescue, navigational aids and environmental response are all essential to public safety and protection of the environment. We believe that the vast majority of British Columbians take very seriously the maintenance of safety to mariners and the integrity of marine ecosystems, and would want these services maintained and in some cases improved.

We are also concerned about what we view as an inadequate public consultation process, and will be urging the federal government to hold a public inquiry into the issues of staffing of BC lighthouses, maintenance of aids to navigation, Coast Guard search and rescue capability, environmental response and preparedness, and proposed changes to the Pilotage Act. We believe that none of these proposed cuts or regulatory changes should be made unless the public has been thoroughly canvassed and has had a real opportunity for involvement in these important issues. A few hours of hearing in four communities is a start, but it's nowhere near enough.