

**March 18, 1997**

Dixie Sullivan, Head, Ocean Disposal Control Program  
Environmental Protection Branch  
Pacific and Yukon Region, Environment Canada

Dear Ms. Sullivan,

I am writing to register our opposition to the proposal by the Artificial Reef Society of BC (ARSBC) to **dump the HMCS Saskatchewan in waters near Snake Island (off Nanaimo)** in June of this year.

We understand that you are very close to giving final approval to this application and urge that prior to the issuance of any ocean disposal permit, a full public consultation process take place. The "public meetings" that have been held to date (organized by the proponents) do not represent an adequate public process.

The Georgia Strait Alliance is a coalition of about 50 environmental, recreational, labor, commercial marine and other organizations founded in 1990 to protect, preserve and restore the marine environment and ecological well-being of Georgia Strait and its adjoining waters. Our members have expressed their concerns many times over regarding the ARSBC's program of deliberate dumping of old military ships to create artificial reefs for divers.

As you will recall, I made a presentation to you, your staff and members of the Regional Ocean Disposal Advisory Committee in 1993, wherein I outlined our concerns arising out of the dumping of the HMCS Chaudiere in Sechart Inlet in 1992 and our [12 recommendations](#) regarding any future proposed ship dumpings. In our experience with the HMCS Chaudiere sinking in 1992, there were a number of problems with what we viewed as an inadequate and questionable public process. We tried to address these issues, along with the environmental concerns, in our recommendations.

At that time I was told by members of your staff that our recommendations were reasonable and deserved consideration. However, to our knowledge they have still not been addressed despite the sinking of two more ships (the Mackenzie off Sidney and the Columbia off Campbell River).

It is the position of the Georgia Strait Alliance, along with many other citizens in the region, that such artificial reef projects should not be approved. We believe that the ARSBC's program of deliberate sinkings of disused ships for reefs runs counter to sound ecological management, pollution prevention and prudent fisheries management.

Our concerns include the following:

1. Sinking disused military ships contradicts the federal Fisheries Act in that it involves the release of deleterious substances into waters frequented by fish, and it is inconsistent with the

London Convention of 1972 aimed at preventing further pollution at sea. Old, highly compartmentalized military ships such as the HMCS Chaudiere, Mackenzie, Columbia and Saskatchewan are virtually impossible to rid of oils, solvents, greases, asbestos and other toxic substances.

2. Sinking old ships also contradicts the federal government's laudable "three R's" policy of reduce, re-use and recycle. Allowing items of primarily metallic origin to be dumped at sea instead of being recycled does nothing to encourage a conserver society and allows us to simply "dispose" of a troublesome problem. How can dumping waste materials in our coastal and oceanic waters possibly contribute towards the long-term vision of the conserver society that Environment Canada has rightfully been urging citizens to create?

3. Although the environmental monitoring of the Chaudiere (and presumably of the Mackenzie and Columbia, if such monitoring is being done) to date does not show a significant impact, the lack of baseline data on the sites prior to dumping means that the monitoring data is not meaningful, as there is no basis for a before/after comparison in the receiving waters, the sediments or the marine life at these sites. Therefore there is no real basis for claiming that the ships are not having a negative impact. The continued dumping of such ships runs contrary to the widely-accepted precautionary principle - ie., 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.

4. 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 warships) rather than being designed for the specific location and for enhancement of specific species considering factors such as the number of chambers, chamber size, optimum reef size, design, substrate, depth vs. distance offshore, spatial arrangement or configuration and materials, etc. Artificial reefs made of old ships and other cast-off materials are unnecessary and may even harm the environment by replacing existing natural habitats with less effective artificial ones. At the very least, we are altering marine habitat by sinking ships.

5. The proposed site for the HMCS Saskatchewan is in waters within the jurisdiction of the Islands Trust (Gabriola Trust area). The Islands Trust Council Policy Statement Bylaw No. 17 (adopted in 1993 and reaffirmed last year) states that "Trust Council holds that artificial reefs should not be developed in the Trust area." Despite this bylaw, the ARSBC was allowed to dump the HMCS Mackenzie within the Trust jurisdiction in 1995 and is now asking to dump another ship in Trust waters. The Islands Trust was established by the province of BC in 1975 to preserve and protect the natural environment of the Gulf Islands. Allowing the ARSBC to dump old ships within the Trust jurisdiction undermines the goals and mandate of the Islands Trust and constitutes a slap in the face to local government.

6. Several provincial agencies are currently working closely with the federal government to establish [marine protected areas](#) (MPA's) in BC waters. MPA's would help to sustain and nurture marine life both within and around the protected areas, thereby helping to ensure economic benefits based on healthy marine resources. We are strongly in support of their establishment, and believe that the presence of additional artificial reefs could compromise government's ability to create MPA's and to ensure that they are properly managed.

7. Since Canadian and foreign scientists agree that artificial reef construction does little to enhance fishery potential in areas of abundant [natural reefs](#) (such as coastal BC), the only real economic benefits are those that accrue to nearby dive shops and charter operators. We believe that such benefits are short-term at best, as our on-site observations of the Chaudiere and Mackenzie sites show that, while attracting many divers at first, these now seem to be used much less frequently. In contrast, the region's abundant natural reefs continue to attract divers regularly. We seriously doubt the ARSBC's continued, unsubstantiated claims that these ships bring "millions" into local economies. We believe the if our 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.

8. The ARSBC has received over \$800,000 in government grants, loans and employment subsidy programs for its ship sinking program to date, yet taxpayers who oppose the sinking of derelict ships and the use of public funds to support this program have had no real chance to be heard. There have been no public hearings prior to the sinking of any of the ARSBC's four ships sunk to date. Environmental assessments of the projects have been lacking in site-specific, baseline data, and have fallen far short of the thorough analysis which we would expect from any other project that could have a significant impact on the local marine environment.

9. As any boater knows, the combination of two different metals in salt water creates a battery effect called electrolysis. The steel hull and aluminum superstructure of these ships corrode quickly underwater, making the ship a potential hazard. A diver who explored the Chaudiere 16 months after its sinking confirmed that pieces of the ship broke away in his hands and jagged edges were exposed that could easily catch on divers' air hoses or other equipment. As you know, a young woman died while diving on one of the ARSBC's ships in 1995, and another diver was injured while diving on the Columbia last year. Who is prepared to accept liability for divers injured or killed on these ships?

In light of the above concerns we urge you to reject the current application. We would appreciate your earliest possible reply. Thank you.

Sincerely,

Laurie MacBride  
Executive Director, Georgia Strait Alliance

cc: Hon. Sergio Marchi, Minister of Environment  
Hon. Charles Caccia, Standing Committee on Environment & Sustainable Development  
Art Martell, Regional Director General, Environment Canada  
Vic Niemela, Regional Director, Environmental Protection  
Martin Pomeroy, Head, Industrial Programs, Environment Canada  
Louis Tousignant, Regional Director, Dept. of Fisheries and Oceans  
John Pringle, Marine Environment & Habitat Sciences, Dept. of Fisheries and Oceans  
Hon. Cathy McGregor, Minister of Environment, Lands & Parks (BC)  
Hon. Corky Evans, Minister of Agriculture, Fisheries and Food (BC)  
Hon. Dale Lovick, MLA  
Hon. Jan Pullinger, Minister of Small Business, Culture and Tourism  
Gordon Wilson, MLA  
Bob Ringma, MP  
Svend Robinson, MP  
David Essig, Chair, Islands Trust  
Gabriola Island Trust Committee  
Policy and Planning Cttee., Islands Trust  
Derek Thompson, Land Use Coordination Office  
Ken Morrison, Ministry of Environment, Lands & Parks (BC)  
Chief Jerry Brown, Nanaimo First Nation  
Island Watch Society