



PORT METRO
vancouver

Tanker Safety Expert Panel

Submission to the Transport Canada Tanker Safety Expert Panel:

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EXECUTIVE SUMMARY

Port Metro Vancouver has served as Canada's Pacific Gateway for bulk oil for more than 50 years, and we have never had a navigational issue with an oil tanker.

However, with increasing demand to ship oil and liquid natural gas commodities through B.C. ports, including Port Metro Vancouver, we welcome the opportunity to contribute to a review of Canada's Marine Oil Spill Preparedness and Response Regime.

We have concentrated our submission on four key focus areas: Spill Prevention, Spill Preparedness, Resourcing the Canadian Coast Guard, Engaging Communities in Spill Response Plans, and Research and Development.

PORT METRO VANCOUVER CONTEXT

Port Metro Vancouver is Canada's largest and most diversified Port and the largest export port in North America. Each year, we trade \$172 billion in goods – or one-fifth of Canada's goods trade – with more than 160 trading economies. In 2012, that amounted to 124 million metric tonnes of cargo in four business sectors: automobiles, breakbulk, bulk and container. Our fifth business sector, cruise, will attract more than 820,000 passengers to Vancouver in 2013 for our Alaskan cruise season.

Port Metro Vancouver is a non-shareholder, financially self-sufficient corporation established by the Government of Canada under the *Canada Marine Act*, and is accountable to the federal Minister of Transportation, Infrastructure and Communities. Our mandate includes contributing to the competitiveness, growth and prosperity of the Canadian economy, and facilitating the movement of goods and people in a safe, efficient and sustainable way.

Our 11-member board is appointed by the federal government: seven members are nominated by port users, and one by each of the federal government, provincial government, the Prairie provinces and the municipalities that surround Port Metro Vancouver. Our jurisdiction covers more than 600 kilometres of shoreline bordering 16 municipalities, one treaty First Nation, and several First Nations. We manage more than 16,000 hectares of water, and nearly 1,000 hectares of land and assets.

With a full range of facilities and services for the international shipping community, including access by three Class 1 railroads, Port Metro Vancouver offers 28 major marine cargo terminals with virtually no draft restrictions, some with Super Post-Panamax capabilities, and extensive on-dock rail facilities.

LIQUID BULK EXPORTS

Port Metro Vancouver has served as Canada's Pacific Gateway for bulk oil for more than 50 years, and we have never had a navigational issue with an oil tanker.

In 2012, Port Metro Vancouver handled 216 tankers (50 of which were crude tankers) out of 3,081 total foreign vessel calls (see Figure 1). Five terminals in Port Metro Vancouver's jurisdiction currently handle liquid bulk petroleum products; of these, the Westridge petroleum terminal is the largest. Westridge exported approximately 3.2 million metric tonnes of crude petroleum in 2012 (via tanker), and also imports and stores aviation turbine fuel for delivery to Vancouver International Airport (via pipeline).

Figure 1: Port Metro Vancouver liquid bulk tanker traffic, 2008-2012

	2008	2009	2010	2011	2012
Total Number of Foreign Vessel Arrivals	3,004	2,791	2,833	3,024	3,081
Total Gross Registered Tonnage ('000)	124,993	119,369	122,849	132,526	139,157
Number of Tanker Arrivals (all liquid bulk products)	241	255	271	206	216
Number of Crude Tanker Arrivals	40	65	71	34	50
Crude Petroleum Tonnage ('000 MT)	2,208	3,916	4,248	2,398	3,245
- By Tankers ('000 MT)	2,031	3,713	4,001	2,178	2,889
- By Barges/Other Vessels ('000 MT)	177	203	247	220	356

SPILL PREVENTION

When it comes to marine transportation of oil, the number one priority for government and industry should always be spill prevention. Regularly examining and comparing Canada's practices with those in world-class liquid-bulk gateways would ensure consistently high standards for spill prevention.

Port Metro Vancouver has worked closely with our marine industry and government stakeholders over the past five years to develop new ways to further strengthen existing safety procedures when escorting all vessels through Burrard Inlet's Second Narrows, to and from Kinder Morgan's Westridge terminal.

All oil tankers calling in Port Metro Vancouver are subject to strict international, national and port authority standards:

- Crew training requirements for vessels transporting petroleum products and chemicals are far more stringent than those of other vessels.
- Oil terminals thoroughly inspect every ship against strict international standards before permitting them to call at their facilities.
- Transport Canada participates in the Port State Control program under which ships are inspected and any inspection reports are shared internationally.

Severe deficiencies result in forcing immediate corrective action. Minor deficiencies are logged and timelines for repairs are given.

- National regulations require all ships to have an approved oil response contractor, such as Western Canada Marine Response Corporation (WCMRC), available to assist them.
- Port Metro Vancouver's harbour regulations include special requirements for oil tankers that outline what they can and cannot do, and requirements for tug escorts. Aframax class tankers of roughly 110,000 deadweight tonnes are the largest tankers to call in Vancouver.
- Port Metro Vancouver requires all tankers to be enclosed with a spill containment boom during all loading and unloading operations.

In 2010, Port Metro Vancouver established the Second Narrows Movement Restriction Area (MRA) and developed the Second Narrows MRA Procedures, in consultation with pilots and the marine industry. The purpose of the MRA Procedures is to facilitate the safe navigation and efficient operation of vessels in this area of Vancouver's Inner Harbour and they form part of the Port's Harbour Practices and Procedures.

The MRA Procedures specify vertical and navigation clearances, and detail transit restrictions, such as:

- Operational periods
- Vessel restrictions
- Navigation channel clearances
- Transit speed
- Order of transit
- Wind restrictions, and
- Visibility

SPILL PREPAREDNESS

Due to depth restrictions in Burrard Inlet, the largest dimension of tanker that can be handled is the Aframax, a medium-sized tanker with a maximum capacity of about 110,000 tonnes. Vessels can currently load to 13.5 metres draft, which is roughly 80% of the capacity of an Aframax class vessel.

Today, Transport Canada requires a certified oil spill responder to have adequate capacity to respond to a spill of up to 10,000 tonnes of oil. While it is unlikely that the full contents of a double-hulled Aframax tanker would be exposed in the event of an incident, this response capacity could be considered insufficient by the public, particularly when compared to regulatory response requirements in adjacent jurisdictions in the United States (30,000 – 32,000 tonnes). Best practice for spill preparedness is considered to be the entire contents of two holds of a tanker's capacity. Another approach is to conduct a geographic-specific, risk-based assessment to determine responder capacity. A risk-based approach would include aspects such as specific navigational risks, proximity to ecologically significant areas, and access and response times.

In order to maintain cross-border and cross-jurisdictional consistency, spill and emergency response and other relevant policies / best practices should be similar in both Canadian and American waters, and cross-border response participation should be consistent to facilitate shared response resources.

To accommodate a transition to a higher response threshold, new facility developments should be expected to immediately meet or exceed the more rigorous requirements, while existing facilities would be given a period of transition to implement the changes.

RESOURCING THE CANADIAN COAST GUARD

The Canadian Coast Guard's (CCG) Environmental Response program mission is to ensure an appropriate level of preparedness and response capability for all ship-source and mystery-source pollution in Canadian waters.

The recent establishment of a new CCG Incident Command System (ICS) is a positive step forward to align the CCS's response plans with those of the provincial and federal governments, as well as private response organizations (such as Port Metro Vancouver).

Given this is a new system, Port Metro Vancouver encourages a plan to ensure the adequacy of resourcing and training of CCG personnel. Expediting and enhancing Incident Command System training – to ensure that officers of CCG have the necessary training, experience and communications skills to act effectively as on-scene commanders – would reinforce the CCG's leadership role in the event of a marine-based oil spill.

ENGAGING COMMUNITIES IN SPILL RESPONSE PLANS

Rapid response is critical in the event of an incident, opening up an opportunity to further engage coastal communities, including First Nations, in spill response operations. The participation of local communities improves and enhances the overall response capabilities in terms of training, equipment, availability and an integrated response command and control.

Port Metro Vancouver supports the inclusion of communities and individuals in spill response plan development, oversight and response; this is a best practice stemming from the *Exxon Valdez* incident of 1989. Today, in Prince William Sound, Alaska, there are regional citizen advisory councils and a Regional Stakeholder Committee that are involved in one major annual drill and frequent smaller drills to ensure local community needs are addressed.

In addition, incorporating fishing personnel and their vessels into a response strategy – particularly in remote locations – provides an additional level of support. This practice should be evaluated and potentially expanded.

Finally, the strategic placement of appropriate oil spill response equipment in locations of higher risk would lessen the response time and would potentially heighten response capabilities.

RESEARCH AND DEVELOPMENT

Marine transportation of oil and LNG commodities through British Columbia ports is poised to increase significantly in the coming years.

Industry, government and Port Metro Vancouver have collectively identified a need for a central collaborative body to become the leading source of information on best practice for marine transportation of oil and LNG commodities on Canada's Pacific Coast. Combining resources to facilitate research and development in this area would help to improve the overall knowledge base for the shipment of oil and LNG commodities, oil spill preparedness and response, and assist Canada in becoming a leader in the safe and sustainable marine transportation of bulk liquids.

Port Metro Vancouver is working to establish a permanent "Centre of Excellence" for the safe and sustainable marine transportation of oil and LNG commodities. This Centre will build on existing activities and fundamental principles, as well as best practices established internationally, to assist Canada in becoming a leader in this area. Funded by an initial contribution from governments and industry, then transitioning to a throughput-based fee on export oil and LNG cargoes, the Centre would be informed by experts around the world, including Canada's Tanker Safety Expert Panel.

With a mandate to be the leading source of information on best practices for shipping Canada's energy and oil and LNG commodities on Canada's Pacific Coast, the Centre would promote and facilitate research and regulatory frameworks that deliver the highest standards in the safe and sustainable shipment of Canada's oil and LNG commodities.

It would also:

- Identify and co-ordinate research and development of shipment of oil and LNG commodities and provide a forum for the development of industry leading best practices and for dialogue with stakeholders and communities;
- Serve as the definitive source for information, communications, education and awareness on safe handling of oil and LNG, storage, marine transportation, and spill prevention, preparedness and response; and
- Provide a structured framework for monitoring the environmental and social effects (positive and negative) of shipment of oil and LNG commodities.