



South Coast Ship Watch Alliance

Dear AVTM Project Team,

Thank you for including the South Coast Ship Watch Alliance (SCSWA, also referred to as the Alliance) as a stakeholder for your consultation process regarding the active vessel traffic management program. Regarding our participation, the SCSWA will continue to provide a united voice for our collective goal of reducing anchorage use and ultimately eliminating these anchorages. Therefore, the undersigned of this letter will be your primary contact throughout the process.

The SCSWA is comprised of community groups from Coastal Communities in Gabriola Island, Ruxton Island, Thetis Island, Ladysmith/Saltair, Salt Spring Island, Cowichan Bay, and the Pender Islands.

We would like to thank you for providing the information that we requested. Although this information has been helpful, it leaves us with several questions. We would like to receive your answers to the following questions before further proceeding.

1) Consultation Process

We have included our [Position Paper](#) and [Fact Sheet](#) regarding anchorage issues, and we respectfully request that they are entered in their entirety into the body of information you are assembling for this work, as they form a key portion but not necessarily the entirety of our submission.

Upon inspecting your Project Summary, we are very concerned about the integrity of this consultation process. It appears that this is a two-tiered process, with decision-making committees composed only of selected industry participants, the scope, and components of the AVTM already decided, and a wider consultation of public stakeholders merely an afterthought after the fact with the sole purpose of advertising your AVTM to the public.

In order to better give transparency to this process, could you please answer the following questions:

- (a) What is the timeline for consultations?***
- (b) Are meetings with your team the actual consultation or is this a selection interview to decide who will participate in consultations as a stakeholder?***
- (c) What will be done with the information collected by these meetings?***
- (d) What is the process to implement the consultations into decision-making for the objectives and components of the AVTM?***
- (e) What is the role of stakeholders participating in the AVTM program?***



South Coast Ship Watch Alliance

2) Scope and Objectives of the AVTM

We are concerned that the scope of the AVTM appears to have been limited to exclude the real issues at stake. The real issues are reducing anchorage demand so that industrial expansion in the Southern Gulf Islands is no longer required and these anchorages can be phased out.

First Nations and Coastal Communities, including our members of this Alliance, have made this position very clear in numerous letters, publications, and meetings with representatives from port and Transport Canada since the escalated use of freighter anchorages began.

It does not bode well for this process that the key issues in your invitation for consultation and the Project Summary were either omitted or reported in a biased manner that reveals that prior input of First Nations and coastal communities have not been taken seriously.

For example, your described increase of 31% in anchorage use is an underestimate that does not address the real problem in the Southern Gulf Islands. Prior to 2008 the waters of the Southern Gulf Islands were used only rarely and mostly by smaller ships for local island harbours. Repurposed anchorage use for the Port of Vancouver increased exponentially during the last decade, from very low numbers to intolerably high use in recent years, as explained in our documents supplied. This industrial expansion has remained contested and only temporarily allowed by the Interim Protocol of 2018, and it is unacceptable for a consultation in good faith to display this situation as a fait accompli beyond negotiation.

Regarding transparency of objectives and targets for the AVTM, we would like to receive specific answers to the following questions:

(a) What are the AVTM's specific targets for reduction in anchorage use (i) at port anchorages, (ii) in the Southern Gulf Islands?

(b) What is the AVTM's proposed schedule for phasing out anchorages in the Southern Gulf Islands?

(c) What are the emergency measures that VFPA is prepared to put into place to relieve residents and marine ecosystems in the Southern Gulf Islands of peak usage of anchorages.

3) Specific Components of the AVTM

We are specifically concerned that AVTM appears to contain the same language of “Reducing anchorage demand” and introducing a “Code of Conduct for vessels at anchorage” that previously framed the temporary Interim Protocol of 2018. This protocol has not been a solution because it did not address root causes of the problem. In fact, the anchorage use increased considerably after



South Coast Ship Watch Alliance

implementation of this protocol, and possibly because the port obtained facilitated access to these anchorages by the introduction of a dedicated algorithm for ship assignments.

As explained in our documents supplied, mitigation or codes of conduct are not a solution. We are further concerned that a revised algorithm by AVTM will – as seen before - create further pressure on the Southern Gulf Islands by allowing AVTM to pack even more ships into the Southern Gulf Islands.

We would like to receive transparency about new components of AVTM that address the real root causes of the problem and that have not been attempted and failed before with the Interim Protocol:

(a) What virtual arrival procedures will be implemented for AVTM, such as virtual Notice of Readiness or virtual inspections?

(b) What procedures and software will be implemented for just-in-time arrival of bulk freighters, thus allowing approaching vessels to optimize speed and arrival time?

(c) What contingency plans and logistics planning will be implemented in commodity supply chains to ensure that these supply chains will not be overbooked by more sales orders than capacity allows, and to ensure that information on supply chain delays will immediately translate into logistics planning for slowing down, redirecting, or delaying new orders for ship schedules?

(d) What financial incentives or disincentives will AVTM bring to the commodity export industry, to encourage shorter vessel turnaround times in the Salish Sea?

We will await your answers to our questions. In the meantime, we will share our concerns widely with the expressed desire to prevent the Southern Gulf Islands from being turned into a permanent industrial parking lot by the port and Transport Canada. It is our belief that both industry and government should have the same objective, as their mandates to protect the environment are clearly stated within the legislation that oversees the work of both. If this is a key objective of the AVTM, we will actively engage in the process.

Thank you for receiving our response regarding your consultation.

We look forward to your response.

Sincerely,

Cheryl Ashlie

Alliance Contact for this Correspondence