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File No.: 5020-30

via online submission: <https://letstalktransportation.ca/OPP>

Transport Canada
Let's talk Ocean Protection Plan

To whom it may concern:

Re: Proactive Vessel Management Discussion Paper

I am writing on behalf of the Islands Trust Council to provide comments on the Proactive Vessel Management Discussion Paper.

We support the proposed collaborative approach the Government of Canada is suggesting for the Proactive Vessel Management Initiative which aims to address vessel traffic issues in local waterways and to reduce the impacts of shipping in the short and long term. We are hopeful that the initiative will result in solutions founded in local knowledge and experience. As the discussion paper states, Indigenous peoples and coastal communities are raising concerns about how waterways are used and the potential impacts of vessels on ecologically and culturally sensitive marine and coastal areas.

There are numerous vessel traffic issues/conflicts in the Islands Trust Area. With significant numbers of recreational boaters with varying levels of skill, including kayakers, there are many issues associated with interactions with commercial deep-sea vessels. There are also many environmental concerns about the impacts vessels can have on local environments including marine pollution, air emissions, illegal and legal sewage dumping, wake damage, and light and noise disturbances to marine and terrestrial wildlife. A dominant issue in our region is the socio-economic impacts of anchored deep-sea commercial vessels. Residents have had enough of the increased number of vessels, the increasing size of these vessels and the longer periods of time that ships spend at anchor. What started as an infrequent practice to accommodate overflow vessel traffic at Port of Vancouver has become a daily traffic handling measure. These issues should be considered through the Proactive Vessel Management Initiative in cooperation with the work being done by the Anchorage Initiative under the Ocean Protection Plan.

While we generally support the discussion paper's framework principles we suggest that they be amended to reference the key principles that the Canada Ocean Strategy says should guide all ocean management decision making: sustainable development, integrated management, and precautionary approach.

We also request that there be funding to allow First Nations and local governments to do research and attend meetings. Meetings should be open to the public and have written records that are available to ensure public transparency. Trust Council policy 5.8.1 states *Trust Council holds that public participation should be part of the decision-making processes of all levels of government*. We also request that regional studies and surveys be determined and designed collaboratively, such as studies that measure shore erosion, sea-bed anchor drag impacts, human health impacts from sound, light, and environmental impacts.

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The Islands Trust Council is a federation of local government bodies representing 26,000 people living within the Islands Trust Area and about 10,000 non-resident property owners. The Islands Trust is responsible for preserving and protecting the unique environment and amenities of the Islands Trust Area through planning and regulating land use, development management, education, cooperation with other agencies, and land conservation. The area covers the islands and waters between the British Columbia mainland and southern Vancouver Island. It includes 13 major and more than 450 smaller islands covering 5200 square kilometres.

Thank you for the opportunity to comment.

Yours sincerely,



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Chair, Islands Trust Council
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cc: Islands Trust Area MPs
Cowichan Tribes
Esquimalt First Nation
Halalt First Nation
Homalco First Nation
Hul'qumi'num Treaty Group
K'omoks First Nation
Klahoose First Nation
Laich-kwil-tach Treaty Society
Lake Cowichan First Nation
Lyackson First Nation
Malahat Nation
Musqueam First Nation
Nanwakolas Council
Pauquachin First Nation
Penelakut Tribe
Qualicum First Nation
Scia'new (Beecher Bay) First Nation
Semiahmoo First Nation
Shíshálh (Sechelt) First Nation
Snaw-naw-as (Nanoose) First Nation
Snuneymuxw (Nanaimo) First Nation
Songhees First Nation
Squamish First Nation
Stz'uminus (Chemainus) First Nation
Te'mexw Treaty Association
Tla'amin (Sliammon) First Nation
T'Sou-ke (Sooke) First Nation
Tsartlip First Nation
Tsawout First Nation
Tsawwassen First Nation
Tseil-Waututh (Burrard Inlet) First Nation
Tseycum First Nation
We Wai Kai (Cape Mudge First Nation)
Wei Wai Kum (Campbell River First Nation)
Bowen Island Municipal Council
Islands Trust Council
Islands Trust website