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Debra Myles
Panel Manager – Roberts Bank Terminal 2 Project
Canadian Environmental Assessment Agency
160 Elgin Street, 22nd Floor
Ottawa, ON, K1A 0H3

By email to: Panel.RBT2@ceaa.gc.ca

Dear Ms. Myles:

Subject: Canadian Coast Guard Comments on Sufficiency and Technical Merit of the Roberts Bank Terminal 2 Environmental Assessment Information (Reference Number 80054)

The Canadian Coast Guard (Coast Guard) is writing in response to the Review Panel's June 9, 2016 letter of direction to the Coast Guard regarding the Review Panel process for the Roberts Bank Terminal 2 Project and the request to assess the proponent's environmental documentation. Coast Guard has completed its evaluation for sufficiency of information and technical merit related to Coast Guard's mandate and areas of expertise.

For the evaluation, Coast Guard has reviewed environmental assessment information that included the Project's Environmental Impact Statement and Marine Shipping Addendum and additional documents submitted by the proponent available on the Canadian Environmental Assessment Registry. Coast Guard's sufficiency and technical merit comments related to its areas of expertise are captured in the attached tables and include one proposed information request and points of clarification.

Although it is a Special Operating Agency of the Department of Fisheries and Oceans (DFO), Coast Guard is filing its submission separately from that of DFO.

Sincerely,
< original signed by >

Chris Henderson
Director General, National Strategies

Attachment: Coast Guard's Roberts Bank Terminal 2 Sufficiency and Technical Merit Submission.

Ottawa, Canada
K1A 0E6

Canada 

Proposed Information Requests on the Sufficiency and Technical Merit of the Environmental Assessment

Participant:

Organization (if applicable): Canadian Coast Guard

General Comments:

The focus of Coast Guard’s review of the sufficiency and technical merit of the Roberts Bank Terminal 2 Project environmental assessment information included the following related to marine safety:

- Environmental response
- Marine Communications and Traffic Services
- Aids to Navigation
- Search and Rescue

Coast Guard has concluded that the environmental assessment information provided by the proponent is sufficient for Coast Guard to carry out its review.

The tables below provide a suggested information request related to the availability of tug support near Boundary Pass and points of clarification concerning the process for reporting marine discharges and the use of dispersants and *in situ* burning for responding to a spill.

Table 1: Proposed Information Requests on the Sufficiency and Technical Merit of the Environmental Assessment

IR #	Topic	Information Source(s) (section or page# of EIS, Marine Shipping Addendum, Responses to Information Requirements, etc.)	Rationale	Proposed Information Request
CCG-IR-01	Risk Mitigation Practices in the Marine Shipping Area.	Section 10.4.1 – Marine Shipping Addendum	This section describes risk mitigation practices in place for marine shipping accidents or malfunctions currently in place in the Marine Shipping Area such as VTS, pilotage,	The availability of tug support is another risk mitigating measure. The Panel may want to consider requesting data on

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IR #	Topic	Information Source(s) (section or page# of EIS, Marine Shipping Addendum, Responses to Information Requirements, etc.)	Rationale	Proposed Information Request
			navigational aids, precautionary areas and special operating instructions.	standby tug availability of appropriate capability and capacity for a large container ship, proximate to Boundary Pass.

Table 2: Clarification/Comments regarding the Environmental Assessment

Section	Text	Clarification/Recommended Changes
<i>Environmental Impact Statement</i>		
Clarification #1: 30.3.3 Port Metro Vancouver Practices and Procedures pages 30-9	All accidental overside discharges in PMV jurisdiction must be reported immediately to the PMV Operations Centre. A discharge containing oil or other deleterious substances must be immediately reported to MCTS Vancouver, which in turn notifies the Canadian Coast Guard and the PMV Operations Centre. The owner of the vessel from which the spill originates, as the Responsible Party, must immediately activate its shipboard oil pollution emergency plan, including its Incident Command System, and request assistance from the WCMRC. The role of On Scene Commander for marine-based oil spills in the Vancouver region is assumed by the Canadian Coast Guard or the WCMRC . Port Metro Vancouver's role in such an incident would	As per the Vessel Pollution and Dangerous Chemicals Regulations, any discharge or anticipated discharge from a vessel must be reported to Canadian Coast Guard's Marine Communications and Traffic Services (MCTS). The Canadian Coast Guard then forwards the Pollution Report (POLREP) to other agencies. An assessment of the pollution report is done by Coast Guard Pollution Response Officer(s) with the support of available resources in the area to

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Section	Text	Clarification/Recommended Changes
	be to maintain situational awareness and coordinate the incident response.	<p>determine the response requirements.</p> <p>It is the responsibility of the polluter to respond to the incident while the Canadian Coast Guard will monitor the response to ensure that appropriate measures are taken. If the polluter at any time is unknown, unwilling or unable to take appropriate measures the Coast Guard has authority to manage the response and take measures that they consider necessary to repair, remedy, minimize or prevent pollution damage. In this context, the Coast Guard has the role of On-scene Commander.</p> <p>The owner of a ship is liable for all costs incurred by the Coast Guard when mitigating oil pollution damages. When Coast Guard incurs costs on behalf of the polluter, efforts are first made to identify and seek recovery from the shipowner or their insurer. If a shipowner fails to comply within one year, Coast Guard files a claim with Canada's Ship-sourced Oil Pollution Fund to recover the costs associated with the response.</p>

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Section	Text	Clarification/Recommended Changes
<p>Clarification #2:</p> <p>10.4.3 General Approach to Spill Response in the Marine Shipping Area. (page 10-19 and 10-20)</p>	<p>Vessel-deployed containment booms and skimmers are the primary equipment used to minimise dispersion and to recover oil. Specifically, booms are used for the following:</p> <ul style="list-style-type: none"> • To limit the spread of oil away from the source and contain the oil for recovery; • To deflect oil away from sensitive shorelines, or from marine locations such as marinas, water intakes, and fish farms; and/or • To deflect oil towards shore for recovery. <p>Once contained, slicks would be herded into thicker layers for removal via skimming. Skimmers remove oil from the surface of water with large, dedicated skimming vessels being used in open unsheltered water, and small handheld units intended for calm and sheltered water.</p> <p>Non-mechanical methods, such as dispersants and <i>in situ</i> burning, are not typically used as they can be deleterious to surrounding populations of wildlife and are not pre-approved for use in Canada. These methods would only be considered on a case-by-case basis through Science Table consultation and would require approval (potentially by the CCG).</p> <p>The planning standards for equipment and personnel require that there be sufficient primary temporary storage capacity to maintain oil/oily water waste recovery operations 24 hours per day. Primary temporary storage capacity is defined as the storage required for each oil recovery unit. The required secondary storage capacity is essentially double the primary storage capacity.</p>	<p>Vessel-deployed containment booms and skimmers are the primary equipment used to minimise dispersion and to recover oil. Specifically, booms are used for the following:</p> <ul style="list-style-type: none"> • To limit the spread of oil away from the source and contain the oil for recovery; • To deflect oil away from sensitive shorelines, or from marine locations such as marinas, water intakes, and fish farms; and/or • To deflect oil towards shore for recovery. <p>Once contained, slicks would be herded into thicker layers for removal via skimming. Skimmers remove oil from the surface of water with large, dedicated skimming vessels being used in open unsheltered water, and small handheld units intended for calm and sheltered water.</p> <p>Non-mechanical methods, such as dispersants and <i>in situ</i> burning are not used as they can be deleterious to surrounding populations of wildlife and are not pre-approved for use in Canada. CCG is not in a position to approve the use of these methods.</p> <p>The planning standards for equipment and</p>

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Section	Text	Clarification/Recommended Changes
		<p>personnel require that there be sufficient primary temporary storage capacity to maintain oil/oily water waste recovery operations 24 hours per day. Primary temporary storage capacity is defined as the storage required for each oil recovery unit. The required secondary storage capacity is essentially double the primary storage capacity.</p>