
November 19, 2018

Re: Bill C-48

Members of the Senate,

The Resource Municipalities Coalition (Coalition) supports responsible resource development as it sustains communities by addressing impacts on ecosystems as well as cumulative impacts to a healthy natural environment and to citizens by ensuring the provision of effective social services that improve quality of life while building a sustainable future.

The Coalition applauds the Federal Government desire to protect Canada's diverse and unique eco-system by introducing legislation that addresses impacts to the ecosystem on the north coast of British Columbia through Bill C-48. However, Bill C-48 fails to address similar ecosystem concerns associated to the coastlines of New Brunswick, the ruggedly beautiful coastline of Newfoundland or the shoreline of the St Lawrence River and Great Lakes, which equally have unique and diverse ecosystems at risk from tanker traffic. The Canadian Government should not pick and choose where and when to exercise environmental conscience – Bill C-48 displays bias and imposes economic hardship:

- The resource sector makes up 17% of Canada's GDP and represents 47% of Canada's total exports annually. Bill C-48 will immediately impact a proposed \$16 billion pipeline project that would see oil moved from Fort McMurray, Alberta to deep water ports on the north coast of British Columbia, improving Canada's export opportunities. Although this project may only represent 3% of the total investment of \$585 billion in existing or proposed major projects in Canada over the next 10 years, it represents an opportunity to improve the quality of life and develop a sustainable future for 30 First Nation communities. The Chief Council, representing the 30 impoverished First Nations, refers to Bill C-48 as "perpetuating past failed colonial policies designed subjugate and marginalized of indigenous people."
- Bill C-48 imposes restriction on size of tankers; to any oil tanker that is carrying crude oil or persistent oil, or any combination of the two, in an amount greater than 12,500 metric tons.¹ Vessels carrying petroleum products and consumer goods to supply many of the geographically remote communities along the north coast of British Columbia are exempt from this law and are seen as essential services to sustain local economies. It should then be considered that providing a sustainable future for these communities also requires employment and social services to improve the quality of life, that can only be brought on by responsible resource development.

1- Bill C-48 as passed by the House of Commons

- Bill C-48's bias - 107.6 million tons of petroleum products move through eastern ports, representing 85% of annual movements in Canada versus 2.2 million from western ports⁴. The expansion of Trans Mountain, the construction of the Eagle Spirit pipeline and other opportunities may only increase west coast shipments by 20% or to 3.0 million tons.
- In the unlikely event of an incident and factoring the potential increase of tanker traffic on the west coast, it is more likely for an incident to occur involving American tankers that move 37 million tons of product through Canadian waters.⁴

In a recent Angus Reid Poll conducted for Clear Seas Center for Responsible Marine Shipping, 67% of Canadians were concerned of a spill from all vessels - not only oil tankers. The recognition that all vessels pose an environmental impact in the event of an incident as demonstrated in the Nathan E. Stewart diesel spill off the north coast of British Columbia is of great importance, as Bill C-48 does not prevent or diminish the negative impacts of a spill by any vessel that currently operates along the north coast of British Columbia and it should be considered that:

- Advancements in technologies and regulation governing the transport of oil in tankers does not mitigate the impacts of an incident, nor does it diminish the concerns of 67% of respondents in a poll, however, globally, incidents involving an oil tanker specifically, has decreased from 56% in the 70's to 3.7% as of 2009, while tanker traffic globally has increased by 42%.²
- Based on data collected from Transport Canada, aerial surveillance of more than 250,000 vessels in Canadian waters in 2014-2015 by aircraft that can detect a spill as small as 1 liter and of the 547 vessels boarded and inspected, .4% were held till problems were fixed,³ demonstrates the aggressiveness of existing programs to protect Canadian coastlines.

The Coalition supports concerns raised by many western Canadians as the Federal Government continues to sabotage the Canadian economy, Bill C-48 much like Bill C-69 restricts Canada's resource sector from supporting a sustainable future:

- In reference to a letter dated November 9th, 2018 addressed to the Senate on Bill C-69 from the Resource Municipalities Coalition, *"In our view, these legislative and regulatory changes will further aggravate Canada's waning competitiveness and are likely to accelerate business investment into other countries, diminishing the country's ability to sustain effective social services that protect Canada's quality of life."*

2 – Kenneth Green, Fraser Institute, published July 18, 2018, Calgary Sun

3 – Tanker Safety by the Numbers, Transport Canada, July 7, 2016

4 – Oil Tanker Facts, Clear Seas

5 – Bill C-48 as passed by the House of Commons

- In statement made to the Canadian House of Commons Standing Committee on Transportation, Infrastructure and Communities by the Business Council of British Columbia, – Canada can “advance renewable technologies in part by using our carbon energy source revenues...Canada needs to overcome its inherent self-sabotaging tendencies...” in reference to Bill C-48.
- With the delay in the Trans Mountain Expansion Project by at least one year, increasing the likelihood that the project will join the similarly ill-fated infrastructure projects like Northern Gateway and Energy East, Prime Minister Trudeau on September 7, 2018 states, “We need to be able to build resource projects of all different types with appropriate social license.” Social license refers to an acceptance of practices by an entity – are Canadians to believe that failure is the new social license as not only can the Federal Government not get a project that supports a healthy Canadian economy started, it introduces legislation like Bill C-48 that eliminates economic opportunity.

It is the view of the Resource Municipalities Coalition that Canadians deserve a clear direction from its government on what it stands for and demonstrates that conviction through action that is in the best interest of all Canadians. Bill C-48 is set to further diminishes Canada’s ability to be competitive in the global economy - specifically the resource sector, fails to support effective social services, or improve the quality of life and erodes a sustainable future for all Canadians.

The Coalition believes that the Senate needs to be the conscience of Canadians, who understand that a sustainable Canadian future depends on unbiased legislation. Senators are urged to refuse Bill C-48 in its entirety.

Sincerely,



Mayor Lori Ackerman
City of Fort St John



Mayor Rob Fraser
District of Taylor



Mayor Keith Bertrand
District of Tumbler Ridge



Mayor Joan Atkinson
District of Mackenzie



Mike Whalley
Executive Director