

TO:

Federal authorities

Right Honourable Justin Trudeau - Prime Minister of Canada

Honourable Joyce Murray - Minister of Fisheries, Oceans and the Canadian Coast Guard

Honourable Omar Alghabra - Minister of Transport

Honourable François-Philippe Champagne - Minister of Innovation, Science and Industry

Mr. Gord Johns - Member of Parliament - Courtenay—Alberni

Provincial authorities

Honourable John Horgan - Premier of the Province of British Columbia

Honourable Katrine Conroy - Minister of Forests, Lands, Natural Resource Operations

Honourable Josie Osborne - Minister of Municipal Affairs & MLA for Mid Island-Pacific Rim

Honourable David Eby - Attorney General and Minister Responsible for Housing

Regional authorities

Mr. Daniel Arbour - CVRD

Mr. Edwin Grieve - CVRD

Ms. Arzeena Hamir - CVRD

CONCERNING: shipbreaking activities at Union Bay, Baynes Sound, BC, Canada

Dear competent authorities,

Brussels, 11 January 2022

We are contacting you regarding the shipbreaking activities conducted by Deep Water Recovery LTD at Union Bay, traditional unceded territory of First Nations within Baynes Sound. Nearby residents and K'ómoks First Nation (KFN) have raised serious concerns regarding the conditions at the yard for the

past eighteen months. We share their concerns and call on the halting of the operations to protect both the local environment and communities from exposure to further harm.

The NGO Shipbreaking Platform represents seventeen human rights and environment organisations worldwide and advocates for clean and safe ship recycling. We do not consider that the landing of vessels onto shores that are unable to contain the many hazardous materials onboard and embedded within the ships' structures, as currently happening at Union Bay, is a sustainable or acceptable way of recycling ships. Indeed, shipbreaking activities conducted without full containment can easily pollute land, water and air, as ships are almost invariably contaminated or containing harmful materials in their paints, gaskets, flooring, insulation and fire retardancy materials (e.g. asbestos, brominated flame retardants), and need to be emptied of residue oils. Recent studies have shown how unregulated scrapping can cause carcinogenic air pollution, loss of marine biodiversity and soil contamination¹. Furthermore, lack of proper infrastructure and access to emergency equipment puts the lives of workers at risk in case of an accident during the dismantling process.

The scrapping activities at Deep Water Recovery LTD are taking place alarmingly close to a residential area and, as per the Federal Government's definition, in an Ecologically and Biologically Significant Area (EBSA). Baynes Sound is the highest ranked cumulative and spawning area for herring in the Strait of Georgia and is a critical feeding and overwintering area for water birds. It also supports the highest density of intertidal shellfish aquaculture in British Columbia, producing over half of all the shellfish cultured in the province². Locating a hazardous industry in such an ecologically sensitive zone is of particular concern, and, according to local residents, Deep Water Recovery LTD is currently operating in non-compliance with the Comox Valley Regional District's zoning bylaws. Neither a proper Environmental Impact Assessment nor a public consultation seem furthermore to have been conducted prior to the dismantling activities having started.

In light of the above, it is clear that Deep Water Recovery LTD is not operating in line with international requirements for the safe and environmentally sound management of hazardous wastes³. We therefore urge you to halt immediately the breaking of ships in Union Bay where, as we write, two

¹https://ec.europa.eu/environment/integration/research/newsalert/pdf/ship_recycling_reducing_human_and_environmental_impacts_55_si_en.pdf

²<https://wwwf.ca/wp-content/uploads/2020/11/Toward-Integrated-Management-in-Baynes-Sound.pdf>

³The Basel Convention's [Technical Guidelines for the Environmentally Sound Management for the Full and Partial Dismantling of Ships](#) call among other things for all operations to be conducted over impermeable surfaces where contaminants can be contained and prevented from entering the environment.

former US Government vessels and a BC Ferries Corporation's passenger ship are moored, possibly waiting to be scrapped⁴.

Vessels can only be recycled in a safe and environmentally sound manner at proper industrial sites that ensure a contained environment with impermeable flooring and drainage systems. We trust that you will join us in promoting sustainable ship recycling practices that are available elsewhere in Canada and outside Canada, and kindly ask you to inform us of actions taken to prevent pollution caused by the activities of Deep Water Recovery LTD.

Yours sincerely,



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Executive Director

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⁴NOAAS Miller Freeman (R 223), NOAAS Surveyor (S 132) and Queen of Burnaby. These vessels are likely to contain high amounts of toxic substances in their structures, including asbestos and PCBs.