



TO:

Government of British Columbia

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 Land, Water and Resource Stewardship & MLA for Mid Island-Pacific Rim

Honourable David Eby - Attorney General and Minister Responsible for Housing

CONCERNING: Shipbreaking activities at Union Bay, Baynes Sound, BC

14 March 2022

Dear Premier and Ministers,

World Wildlife Fund Canada (WWF), Stand.earth, Georgia Strait Alliance, the NGO Shipbreaking Platform and the Basel Action Network (BAN) are contacting you regarding the shipbreaking activities conducted by Deep Water Recovery LTD (DWR) at Union Bay, traditional unceded territory of several First Nations within Baynes Sound, including the K'ómoks First Nation, Qualicum First Nation, Tla'amin Nation, among others.

Nearby residents and K'ómoks First Nation (KFN) have [raised serious concerns](#) regarding the conditions at DWR for the past nineteen months. We share their concerns.

The scrapping activities at DWR are taking place alarmingly close to a residential area and in a federally defined Ecologically and Biologically Significant Area. 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 province. Locating a hazardous industry in such an important ecosystem is of particular concern.

On February 15, the CVRD Board determined that the scrapping of vessels is not a permitted activity in the Industrial Marine (IM) zone according to the Rural Comox Valley Zoning Bylaw and voted to seek an interim injunction against the operator.

We urge you to support CVRD's decision and immediately revoke the change in purpose, performed by your South Island Natural Resource District on 15 October 2021, of the lease fronting DWR private land near Union Bay. Changing an existing *Land Act* Industrial – Log Handling lease to an Industrial – General lease for the purpose of facilitating upland hazardous activities is a threat for Union Bay's

sensitive environmental area, the economic initiatives depending on its ecological services and the health of local residents.

Vessels can only be recycled in a safe and environmentally sound manner at proper industrial sites that ensure a contained environment.¹ Indeed, recent studies² have shown how unregulated scrapping can cause carcinogenic air pollution, loss of marine biodiversity, and soil contamination. Given the lack of rules on clean and safe ship recycling in Canada, we also invite you to work with the Federal Government to create broader regulations, and follow the example from existing international legal frameworks (e.g. Basel Convention) as well as from European legislation (e.g. EU Ship Recycling Regulation) on the subject.

We request you to stop any type of shipbreaking activity in Union Bay, and we trust that you will join us in promoting sustainable ship recycling practices that are available elsewhere in Canada and outside Canada. We kindly ask you to inform us of actions taken at the provincial level to prevent negative effects to people and the environment caused by the activities of DWR.

Yours sincerely,



Ingvild Jenssen
Executive Director
NGO Shipbreaking Platform



Jim Puckett
Executive Director
Basel Action Network



Kimberley Dunn
Senior Specialist, Marine Conservation
WWF-Canada



Anna Barford
Canada Shipping Campaigner
Stand.earth



Christianne Wilhelmson
Executive Director
Georgia Strait Alliance

¹ The 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.

² https://ec.europa.eu/environment/integration/research/newsalert/pdf/ship_recycling_reducing_human_and_environmental_impacts_55si_en.pdf