



Port of Vancouver exhaust gas cleaning system (EGCS) wash water discharge requirements

Comments submitted by the Shipping Federation of Canada

January 7, 2022

Introduction

We are writing on behalf of the Shipping Federation of Canada, which is the national voice of the owners, operators and agents of ocean ships that carry Canada's imports and exports to and from ports throughout the world. Our members represent over 200 shipping companies whose vessels are involved in all shipping trades, including dry and liquid bulk, breakbulk, containers and cruise.

We appreciate the opportunity to submit comments on the Port of Vancouver's planned regulations on the use of Exhaust Gas Cleaning System (EGCS), the first phase of which was announced in the November 24, 2021 Notice of Amendment to the Port of Vancouver Information Guide.

SFC Recommendations on Proposed Requirements

Use of EGCSs is a commercial decision that some but not all of our members have made. That said, those members that invested in EGCS did so with the understanding that it is explicitly allowed under international regulations to achieve clean air standards.

Because creating local requirements that are different from international norms creates a complex regulatory environment and changes commercial conditions, we appreciate that the Port of Vancouver initially paused the rollout of these requirements. However, there are a number of issues that should be addressed before the port implements prohibitions on EGCS use within its waters.

Science-Based Environmental Targets

We applaud the port's work to develop a science-based approach to EGCS regulation via commissioning studies (by Northwest Hydraulics Consultants and Golder Associates) released in 2021. We understand the port is also considering the results of the 2021 report Transport Canada commissioned from CE Delft, which also models EGCS impact to the Port of Vancouver but arrives at different conclusions than the port study.

As you are aware, there is ongoing work at IMO's Marine Environment Protection Committee (MEPC) related to the *Evaluation and Harmonisation of rules and guidance on discharge water from EGCS into the aquatic environment*. At its last meeting in November 2021, the MEPC confirmed the scope of work and instructed its technical subcommittee (PPR) to continue working on the development of a risk-assessment framework and guidelines setting out factors that should be taken into consideration to enhance harmonization when assessing the risks and possible harmful effects of EGCS discharge water, as well as on guidance regarding the delivery of EGCS residues to port reception facilities, assessment of

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the state of technology for EGCS discharge water treatment and development of appropriate regulatory measures and instruments, as needed. The MEPC tasked PPR to complete this work by 2022.

Noting a lack of scientific consensus on the degree of potential environmental effects caused by EGCS within the Port of Vancouver and the expected release of the IMO MEPC (PPR) set of guidance on discharge water from EGCS later this year, we recommend that the Port delay the introduction of regulations on EGCS use until the recommendations of IMO are known and thoroughly considered, and work with Transport Canada to arrive at a consensus on the environmental impact of EGCS discharges.

We appreciate this opportunity to provide input into the port's proposed EGCS wash water discharge requirements, and trust that the above recommendations – which have been submitted on behalf of owners and operators of the ocean ships that call the Port of Vancouver – will be given due consideration.

Sincerely,



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