



January 12, 2021

Fisheries and Oceans Canada
Marine Environmental Quality
Marine Planning and Conservation Directorate
DFO.MarineEnvironmentalQuality-QualiteduMilieuMarin.MPO@dfo-mpo.gc.ca

Re: Comments on DFO Discussion Document: *An Ocean Noise Strategy for Canada*

The Shipping Federation of Canada, which was incorporated by an Act of Parliament in 1903, represents the owners, operators and agents of ocean-going vessels carrying Canada's imports and exports to and from world markets.

Our members' vessels call ports throughout Canada, from the Atlantic to the St. Lawrence and Great Lakes to the West Coast and the Arctic – and therefore have a direct interest in discussions on strategic approaches to minimizing the impact of ship noise on at-risk whales in Canadian waters.

We thank Fisheries and Oceans Canada for the opportunity to submit comments on the department's *Discussion Document: An Ocean Noise Strategy for Canada*.

In our opinion, there are at least two key challenges that the Canadian government must tackle to better understand and minimize the impact of underwater noise:

- **Closing the gaps in relation to noise measurements and modeling:** There is a lack of effective network of noise measurement stations **domestically and internationally**, which is an important pre-requisite to effectively moving forward the discussion on reducing underwater noise from vessels. Although the upcoming Marine Acoustic Research Station (MARS) in the St. Lawrence Estuary along with investments in underwater noise listening

SHIPPING FEDERATION OF CANADA

625 René-Lévesque, Suite 800, Montreal, QC, H3B 1R2 (514-849-2325)
1055 West Hastings, Suite 300, Vancouver, BC, V6E 2E9 (778-373-1518)
www.shipfed.ca

stations in the Salish Sea on the West Coast are definitively steps in the right direction, much remain to be done to address the measurement gaps nationally and internationally. Furthermore, the shipping industry is still facing limitations with regard to existing acoustic models – including the need for enhanced vessel source level measurements under different operating conditions to validate and improve noise modelling.

- **Developing a strategic long-term plan for the deployment of whale detection technologies in Canadian waters:** Over the last few years, the federal government has made significant investments in whale detection technologies in some parts of Canadian waters. However, we believe that it is now time for the government to develop a multi-year strategic plan in order to maximise efficiency and cost-effectiveness of whale detection efforts – which is key to managing the impacts of both vessel noise and ship strikes on at-risk whales. Furthermore, a multi-year strategic plan is much needed in a context where financial resources are finite - even more so as the government will be reviewing spending in the aftermath of COVID. A commitment to developing and implementing a multi-year strategic plan on whale detection technologies should be an integral component of an overall Ocean Noise Strategy. The Canadian government, the shipping industry and science partners need enhanced data on whale distribution – in order to properly inform a Canadian strategic vision and management measures.

In addition to the above, we wish to submit the following comments on the proposals contained in the discussion document.

- As an overall comment, we support the need for a comprehensive strategy on Ocean Noise in a context where coordination of the various departmental policy initiatives along with transparency and sharing of government’s research data is much needed. However, **we also suggest to include a commitment to “complementary”** whereby public funding is used to leverage science research and technology development done by outside partners with the ultimate goal of maximising efficiency of resources. The partnership between Transport Canada and the University of New Brunswick for the use of underwater acoustic glider on the east coast as well as the collaboration between Transport Canada, JASCO Applied Sciences and the ECHO program for the deployment of an underwater listening station in the Salish Sea are two primary examples. Going forward, there is a need for an explicit commitment to complementarity in Canada’s Ocean Noise Strategy – either as part of the Vision or as a key objective under Theme 1 of the draft strategic framework

- Furthermore, DFO’s discussion paper highlights the importance of a coordinated approach with other jurisdictions (Theme 2 of the proposed strategic framework). On the other hand, the discussion paper also states that the *Ocean Noise Strategy is meant to have a domestic focus*. In this respect, we need to highlight the fact that Canada cannot proceed unilaterally when it comes to the development and installation/retrofitting of noise reduction technologies on international vessels calling Canadian waters. **This much needed work must be done through the International Maritime Organisation. This is an important contextual piece and should be explicitly stated in a Canadian Noise Strategy.**
- Another important contextual piece is the need to situate a Canadian Ocean Noise Strategy in its broader policy context. For the maritime industry, the relationship between reduction of underwater noise and energy efficiency must be further investigated and better understood in order to avoid unintended consequences and seek win-win solutions – as Canada is committed to both reduction of both GHG emissions and noise reduction. This should be explicitly acknowledged either as part of the Strategic Framework.
- Finally, we offer the following comments on the proposed guiding principles
 - The draft framework proposes to adopt a “*precautionary approach based on risk*” – which we find ambiguous. For examples, will it be a precautionary approach based on risk prevention policies? on risk management policies? Or on risk assessment? **We believe that these concepts entail different philosophies.** We will await further details on this proposed guiding principle in order to provide additional comments.
 - **We would also suggest to add transparency** (for the sharing of science data and the development of technologies) as a guiding principle. Although this government is committed to an open and transparent government as part of its high-level priorities, we believe that there is a need to establish transparency as an explicit guiding principle in the Ocean Noise Strategy to prevent any repeat of the past where science data relating to whale population and biology has often been kept under ineffective silos.

Respectfully submitted,



Sonia Simard
Director, Legislation and Environmental Affairs
Shipping Federation of Canada