Hi andrea.

Here's my pitch for ship breaking:

A U.S. based company is taking advantage of a lack of environmental legislation in B.C. to run a ship breaking business in Baynes Sound, according to a citizens advocacy group that opposes the business. Ship breaking is when you cut ships up for scrap.

The Concerned Citizens of Baynes Sound says Deep Water Recovery Ltd. https://www.dnb.com/business-directory/company-profiles.deep_water_recovery_ltd.ad01f1b86db208b771868f70b7358f61.html_" is running an unregulated/unlawful ship breaking operation. CCBS says this industry poses serious environmental and human health risks to Baynes Sound (where B.C. gets "the majority" of its commercial shellfish_https://www2.gov.bc.ca/gov/content/industry/agriculture-seafood/fisheries-and-aquaculture/sustainable-seafood/shellfish-reserves/baynes-sound-recreational-shellfish-reserve">https://www2.gov.bc.ca/gov/content/industry/agriculture-seafood/fisheries-and-aquaculture/sustainable-seafood/shellfish-reserves/baynes-sound-recreational-shellfish-reserve and to Union Bay, the small community right beside the ship breaking operations.

So far I have talked with Ray Newcastle, an organizing member of CCBS.

Ray says Deep Water Recovery Ltd. is breaking several federal/provincial regulations, but the bigger problem is they're taking advantage of a lack of federal and provincial legislation to regulate a ship breaking industry. He says that's why this is a U.S. company bringing in U.S. ships to break, when those ships could have been sent to a highly regulated ship breaking company in Texas.

Ship breaking is extremely hazardous and can pollute the area/people with "asbestos, heavy metals, such as mercury and lead, polychorinated biphenyls (PCBs), carcinogenic polycyclic aromatic hydrocarbons (PAHs), contaminated bilge water and ballast water containing sediment and bio-organisms" according to a Global News 2013 article about Newfoundland's ship breaking industry. https://globalnews.ca/news/837009/ship-breaking-newfoundlands-legacy-with-one-of-the-most-hazardous-jobs/

There's even a United Nations organization on this called the NGO Shipbreaking Platform focusing on reversing the environmental harm and human rights abuses caused by this industry. The Shipbreaking Platform has partnered up with CCBS and agrees that Deep Water Recovery Ltd. is running an illegal operation.

The K'ómox First Nation has also come out in strong opposition of the ship breaking business in their traditional territory because of the risk it poses to shellfish in the area. https://komoks.ca/kfn-opposed-to-ship-breaking-activities-in-union-bay/

West Coast Environmental Law has apparently just taken on this case and will be arguing on behalf of CCBS to stop this ship breaking business.

Ray says the feds and province started paying attention once the NGO Shipbreaking Platform partnered with CCBS, but are waiting for the Comox Valley Regional District, the regional government, to make the first move. Ray says the regional district is currently in talks to figure out what to do, which brings in the timelines of this story.

There's also a BC Ferries vessel parked in the area that looks like it'll be cut up by Deep Water Recovery. Ray says BC Ferries is wishy-washy on whether or not it'll go through with the process, and is hoping to raise awareness about the lack of regulatory compliance of the company to force BC Ferries to take their old ship elsewhere.

What I'm hoping to do with this story:

- Figure out what's going on. What do Deep Water's operations look like? What do they do, and can they explain how they're following all the rules? Do local/provincial/federal governments support or oppose this?
- Talk to the opposition: What regulations are being broken, where does the responsibility lie (deep water is federal, beaches are provincial and above high tide lines are regional jurisdiction. Who is responsible for regulating a ship sitting in all three areas?)
- What are the environmental and health risks posed by this industry? (K'ómox First Nation could weigh in here.) Highly regulated ship breaking operations exist around the world. How does the local ship breaking operation match up?
- Talk with the NGO Shipbreaking Platform to get a neutral opinion on this site. How bad is it compared to other Canadian businesses, or other international businesses?
- Pull back for the bigger policy question: does Canada/B.C. have legislation to regulate ship breaking? Do we need some? West Coast Environmental Law could weigh in here.

Thanks!

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