

## Open Letter : Protect Coastal Waters from Cruise Ship Pollution

November 27, 2024

To: Minister of Transport, Anita Anand

Cc: Minister of Environment and Climate Change Canada, Steven Guilbeault;

and Minister of Fisheries, Oceans and the Canadian Coast Guard, Diane LeBouthillier;

and Minister of Tourism of Canada, Soraya Martinez Ferrada

Re: Impacts of Cruise Ship Water Pollution via the Discharge of Sewage, Release of Greywater, and release of Scrubber Wastewater in Canadian Waters

Dear Minister Anita Anand,

We write to you today as environmental organizations, researchers, aquaculture professionals, First Nations, and individuals to express our concern with the insufficient protection of waters under Canadian jurisdictions under the recently [reinstated Interim Order](#) "Respecting the Discharge of Sewage and the Release of Greywater by Cruise Ships in Canadian Waters" reinstated on June 10th, 2024. With [the original Interim Order](#) released in June 2023, it appeared that Transport Canada was finally addressing the issue of more than [31 billion litres](#) (and growing) of contaminated sewage, greywater and Exhaust Gas Cleaning System "scrubber" wastewater entering the coastal waters of British Columbia annually. Unfortunately, the renewal of the Interim Order just days before World Ocean Day included no significant changes and continues to put at risk the health of coastal ecosystems and communities.

The renewed Interim Order stipulates that sewage and greywater released from cruise ships may not be released within 3 nautical miles offshore, and if released between 3 to 12 nautical miles offshore, the waste water must be treated to meet a standard fecal coliform count of 14/100mL, must not contain visible solids, leave a sheen, or leave a sludge or emulsion, nor create water discoloration under the surface or on the shoreline. It still has no mention of scrubber wastewater, a highly toxic and acidic wastestream which by volume accounts for the largest proportion of cruise ship water pollution in waters under Canadian jurisdiction. Environment and Climate Change Canada (ECCC) estimates that marine vessel scrubbers contribute between 40-98% of the loading of priority contaminants within 300m of endangered Southern Resident Killer Whale critical habitat.

### **Bellingham, U.S.**

Traditional Lummi and  
Nooksack Lands  
1329 N State St #302  
Bellingham, WA 98225

### **San Francisco, U.S.**

Traditional Chochenyo and Karkin  
Ohlone Lands  
548 Market Street Suite 74196  
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### **Vancouver, CA**

The Unceded Territories of the  
Səlilwətaʔ, xʷməθkʷəy̍əm, and  
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Vancouver, BC V5P 3V6

While renewing the Interim Order is a step in the right direction it still lists some key exemptions:

- Geographic exemptions: A cruise ship can discharge sewage and greywater within 3 nautical miles from shore using a Marine Sanitation Device (MSD; a technology known to have deficiencies) if: the cruise ship does not have adequate tank storage space and it is sailing between two shorelines less than 6 nm apart OR there are no available and adequate onshore reception facilities to receive its greywater and sewage en route

- Geographic limitations: Massive areas in the Great Bear Sea lie outside 12 nm offshore from the mainland and are thus still unregulated “toilet bowls.” These areas fall within the Internal Waters of Canada and large parts of them will form part of the proposed Great Bear Sea marine protected area (MPA) Network and thus Canada can and should be protecting these areas from cruise ship discharges

- Scrubber wastewater exclusion: Scrubber wastewater is not addressed, despite it being the largest volume of cruise ship effluent discharged.

The language in the renewed Order is still vague in that it does not specify what is considered adequate tank space, nor is there public information on onshore reception facilities along major cruise routes. Additionally, this Interim Order does not include ways to monitor, analyze, report on, and enforce these measures. These regulations are insufficient to protect marine biodiversity and support the health of coastal communities.

Recent analyses from a [report](#) co-authored by Stand.Earth and CPAWS-BC reveals that given these exemptions, huge swaths of coastal waters and majestic fjords remain unprotected from cruise ship water pollution. Under current measures around 35% of the proposed Marine Protected Area (MPA) Network in the Great Bear Sea is open to the discharge of untreated sewage and greywater through unregulated “toilet bowls” if the Interim Order supersedes the enhanced restrictions of the MPA Protection Standard.

These exemptions put at risk this iconic marine area next to the Great Bear Rainforest off the coast of British Columbia -home to one of the most biodiverse ecosystems in the world, including iconic and threatened resident killer whales, sea otters, kelp forests and multiple salmon species. Pollution from cruise ships on the West Coast poses ecological, socioeconomic, and human health risks as a massive volume of toxic greywater, sewage, and scrubber wastewater are being released into extremely important coastal environments.

Together, we’re calling on the Government of Canada to follow the recommendations outlined in this report, including:

1. Legally require cruise ships to have holding tanks that are of adequate size to store all sewage and greywater produced during a ship’s intended voyage.

2. Eliminate the geographical exemption permitting cruise ships to discharge sewage and greywater in areas where the shores are narrower than 6 nautical miles wide.
3. Eliminate the exception that permits cruise ships to discharge sewage and greywater within 3 nautical miles of shore if no onshore reception facilities exist on the ship's intended voyage.
4. Close the "toilet bowls" in the Great Bear Sea by extending the application of cruise ship discharge regulations to the entirety of Canada's Internal Waters and territorial seas.
5. Designate no-discharge zones for sewage and greywater within marine protected areas to align with the proposed enhanced restrictions of the MPA Protection Standard.
6. Prohibit the use of scrubbers in Canada's Internal Waters and territorial seas.
7. Require regular, independent third-party monitoring while cruise ships are underway to ensure discharge requirements are met. Fund this program by a per-passenger fee.

Canada has a responsibility and moral obligation to prioritize protecting its coastal biodiversity, respect the rights of coastal First Nations, and to conserve the bounty and beauty of Canadian coasts for future generations. We look forward to seeing how these recommendations are enshrined in more permanent policy through commitment to a transition plan addressing Canadian Cruise Ship Pollution Measures.

The full report is available here:

<https://stand.earth/resources/report-cruise-ship-waste-canada-transport-ministry-interim-order/>

Sincerely,

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Timothy Green, Canada Research Chair in Shellfish Health and Genomics, Vancouver Island University

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Trelley Hattaway, Concerned community member

Vicki Küng, Executive Director, Fair Sailing