



## Letter of Comment([A71891](#))

Name: Ms. Brown, Diane
Title: President
Group: Womens International League for Peace and Freedom, Nanaimo Branch
Your Application to Participate (ATP): <a href="#">A57715</a> filed on 2014-02-10
Letter of Comment Filing Date: 2015-08-16

### Hearing Information

Project Name: Trans Mountain Pipeline Expansion Project
Company: Trans Mountain Pipeline ULC
File Number: OF-Fac-Oil-T260-2013-03 02
Hearing Order: OH-001-2014

### Comments

WILPF's main concern is the likelihood of oil spills occurring with the increased tanker traffic on The Georgia Strait and Salish Sea.

#### Who We Are

The Nanaimo chapter of the Women's International League for Peace and Freedom has been active since 2001. We are a peace and justice group on the east coast of Vancouver Island. Our members live here and are familiar with our coast and waters. Our membership includes mothers and grandmothers, women who are business owners here and women who work or are retired. This August 6th we hosted our fourteenth annual lantern ceremony on Nanaimo's waterfront to remember the bombing of Hiroshima and to support the protection of our planet and its peoples. This is a ceremony attended each year by our Mayor, our MLA and our MP. A major oil spill would take only a short time to wash up on the beach at Maffeo Sutton Park where we hold our ceremony.

Our concerns about increased tanker traffic and the transportation of raw bitumen in our waters.

It is our understanding from documents submitted by other Intervenors that there is no proven way to retrieve the toxic bitumen from the ocean floor where it is affected by water depth, currents and sediment.

We also know that the waters off Hartley Bay are polluted to this day from the sinking of The Queen of the North and a previous freighter that went down over ten years ago. These two incidents devastated the livelihood and life style of those people because of the fuel oil leaked. An accident involving tankers carrying

bitumen would be even worse.

Our own coastal communities are also dependent on clean water. We are a tourist destination and have thriving recreational businesses, fishing and shellfish harvesting. Many businesses here depend on healthy oceans in order to survive. Our mild weather allows our local population as well as many tourists to be active on the water and on the beaches all year around. A tanker accident involving bitumen escape could absolutely ruin the economy of Nanaimo and area.

Who takes responsibility for an oil spill in our waters? Does Kinder Morgan have a responsibility for the product ( bitumen) after it leaves the terminal in Burnaby?

If Kinder Morgan is responsible, we are being asked to trust a company which has had four major oil spills on the existing line since 2005.

When over one hundred people from across BC, including members of our group, were arrested on Burnaby Mountain for trespassing against the illegal drilling for the pipeline, the charges were all thrown out by the BC Court because Kinder Morgan had given the police the wrong set of coordinates and they had held their line in the wrong place. If the Company gives the wrong coordinates in a situation like this, how can we trust that there will not be major errors with the building of the pipeline?

If Kinder Morgan is not responsible for oil spills from tanker accidents in the Strait, then who is? Is it the owner of the tanker, the country of its origin? Is it the municipality or the province? What happens if there is insufficient money available for the complex retrieval of bitumen and other clean up?

No accommodation for waiting tankers on the Strait

Expansion of this pipeline will mean an increase of tankers in Burrard Inlet from 5 to 34 a month. Already the Ports of Vancouver and Burnaby are unable to accommodate all the freighters and existing tankers that wait to pick up their product from these places. Freighters have been anchoring off Nanaimo and Gabriola Island in past months while they wait to get into Vancouver.

One hundred Gabriola Island residents recently demonstrated against the presence of these ships which are unpleasant noisy neighbours. Local residents are concerned about destruction to the marine life as these ships anchor very close to Gabriola trying to find ideal anchorage. The presence of these large vessels spoil the serene and beautiful ambiance for residents and for visiting tourists. Residents do not want these tankers anchored here and there is no capacity to receive additional oil tankers in Vancouver.

Rights of First Nations must be honoured.

The Canadian government must respect the wishes of the Nations affected by this proposal. We note that NEB conditions call for Company reporting of discussions with First Nations. This is not good enough. In fact, it is actually dismissive of their legal Rights. We find it shocking. The land involved is unceded land. No project should go forward without the explicit permission of the First Nations who own the land. It is also of concern to us that the Snuneymuxw, Coast Salish people, who are part of our community would have a further assault on their resources from anchorage of the tankers and from potential accidents and spillage of bitumen.

Process

517 Tenth Avenue SW  
Calgary, Alberta T2R 0A8

517, Dixième Avenue S.-O.  
Calgary, (Alberta) T2R 0A8

Canada 

Telephone/Téléphone : (403) 292-4800  
Facsimile/Télécopieur : (403) 292-5503  
<http://www..neb-one.gc.ca>  
1-800-899-1265

Although WILPF is pleased to be accepted to comment, we are aware that selection to participate in this hearing was limited. This is unfortunate with a project of this scope and means that much expertise is not available to the Hearing. The parameters set for the hearing in disallowing mention of the oil sands, greenhouse gases and climate change mean that the most important evidence is discounted before the Hearing even begins. With 27 climate change experts rejected as Intervenors or Commenters, the real scope of this project is hidden.

This pipeline expansion project will mean an increase of bitumen production by 590,000 barrels per day causing an output of 120 million tonnes of carbon dioxide a year, massive amounts that will add to the destruction of our environment for generations to come. As mothers, grandmothers and guardians of next generations, we strongly urge you to reject this project.

Thank you for reading and considering our comment. We feel that the risks of this project are far too great and urge you to recommend that the Trans Mountain Pipeline Expansion Project be rejected.

## Attachments

Document Name	Document Type	Size
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