



THE BRITISH COLUMBIA COAST PILOTS LTD.

1450 – 1130 WEST PENDER STREET, VANCOUVER, B.C. V6E 4A4
TEL: (604) 688-0291 FAX: (604) 688-5250

April 16, 2025

Dr. Sheri Tonn, Chair
Washington State Board of Pilotage Commissioners

Dear Dr. Tonn,

Re: Proposed Application of RCW 88.16.180 – Implications for Tankers Transiting Haro Strait and Boundary Pass

On behalf of the British Columbia Coast Pilots (BCCP), I am writing to respectfully convey our concerns regarding the proposed application of RCW 88.16.180 to oil tankers engaged in innocent passage through Haro Strait and Boundary Pass en route to Canadian ports.

BCCP are dedicated to the highest standards of maritime safety and professionalism. Throughout our history, we have built a strong legacy of safe, efficient, and reliable pilotage through Canadian waters on the coast of British Columbia, including in Haro Strait and Boundary Pass. This enduring commitment to safety continues to guide every aspect of our operations and remains central to the trust placed in us by government, industry partners and the public alike.

We submit the following key points for your consideration:

An Unparalleled Record of Safety and Reliability

Since our founding in 1974, the British Columbia Coast Pilots have completed over 400,000 transits through Haro Strait and Boundary Pass without a single incident. This exceptional safety record over five decades reflects our pilots' deep local knowledge, rigorous training, and adherence to the highest operational standards.

Equally, we have never experienced a missed assignment or delay due to pilot unavailability – exemplifying our unwavering reliability in serving these critical and environmentally sensitive waterways.

The consistency and reliability of this system clearly demonstrate that the current operational practice in Boundary Pass and Haro Strait is both effective and sufficient. Introducing additional pilot changes within this well-established transit route would create



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avoidable operational complexity and increase the potential for miscommunication during critical navigational phases – all without yielding any corresponding safety benefit.

It is also worth noting that numerous Puget Sound Pilots have, as part of their own certification requirements, completed familiarization voyages under the direct supervision of BC Coast Pilots through these very passages. This practice reflects the high degree of mutual respect and professional interoperability between our pilotage jurisdictions. To that point, the depth of experience, training, and local knowledge held by BC Coast Pilots ensures that having a Canadian pilot at the con offers the same high standard of safety as would be provided by a Puget Sound Pilot.

Established Operational Integration with Canadian Tug Operators

All laden tankers transiting Haro Strait and Boundary Pass under Canadian pilotage are required to be escorted by tethered tugboat. The BC Coast Pilots maintain a longstanding, well-coordinated working relationship with Canadian tug operators, ensuring seamless communication and unified decision-making throughout these critical transits.

This operational alignment contributes not only to navigational safety but also to the protection of the marine environment, including through our participation in the Port of Vancouver's Enhancing Cetacean Habitat and Observation (ECHO) Program. Our pilots consistently demonstrate a high level of environmental stewardship by adhering to voluntary seasonal slowdown zones and communicating with the Canadian Coast Guard and marine mammal observation networks.

The high degree of coordination between Canadian pilots and Canadian tug crews is a core element of the safety and efficiency achieved in these waters. This integration justifies the continuation of current operating procedures, which have proven successful in managing risk and supporting safe, predictable vessel movements through Haro Strait and Boundary Pass.

Conclusion

We are confident that the current model of Canadian pilotage in these waters, supported by robust tug escort requirements and extensive environmental protocols, remains the most appropriate framework for ensuring navigational safety and minimizing environmental risk.



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We would welcome the opportunity to engage further with your Board and other stakeholders to ensure that any decisions taken continue to reflect the shared commitment of our jurisdictions to maritime safety and stewardship.

Yours sincerely,

Capt. Jake Spink
President, British Columbia Coast Pilots Ltd.

Cc: Jaimie Bever, Executive Director, Washington State Board of Pilotage
Commissioners