



CHAMBER OF SHIPPING

26th of May 2025

Dr. Sheri Tonn, Chair

Washington State Board of Pilotage Commissioners

Email: TonnS@wsdot.wa.gov

Subject: Clarification Requested on 25 April 2025 Notice concerning *RCW 88.16.180*

Dear Dr. Tonn,

The Chamber of Shipping represents the vessel owners and agents whose ships call at ports throughout British Columbia. We support the Board's mandate for safe and environmentally sound navigation, and we appreciate the opportunity to seek clarification on the "Notice to Vessels and Agents Regarding *RCW 88.16.180* Oil Tankers – State Licensed Pilot Required," issued on 25 April 2025.

RCW 88.16.170 states that the purpose of *RCW 88.16.180* is to decrease the likelihood of oil spills in Puget Sound, adjacent waters, and the Columbia River by requiring large oil tankers to employ licensed pilots and tug escorts. Because an unladen tanker carries no oil as cargo, it cannot spill crude or product cargo; yet the notice obliges all tankers over 40,000 dwt, regardless, to engage a Washington-licensed pilot when departing a Washington port and proceeding to British Columbia via Haro Strait and Boundary Pass (and vice-versa). This appears broader than the legislature's stated intent of protecting the state's waters from oil spill incidents.

We recently observed the practical consequences of this wording. An unladen tanker that bunkered at Port Angeles was instructed, under the new notice, to retain its Washington pilot on a continuous job to Westridge Marine Terminal. Under established practice, the vessel should have ended U.S. pilotage at the Port Angeles pilot station, then boarded Canadian pilots at Victoria Pilot Station for the onward voyage. Instead, due to the confusion caused by the new letter, the vessel eventually sailed out to sea (Buoy "J"), turned around, and re-entered Juan de Fuca to comply—burning extra fuel, producing unnecessary emissions, and adding navigational risk.

To help our members comply with pilotage requirements while upholding the safety and environmental aims of the statute, we respectfully ask:

1. Applicability to Unladen Tankers

Does the Board intend the notice to cover unladen tankers, even though *RCW 88.16.170* frames *RCW 88.16.180* as a measure to reduce the risk of oil spills from vessels carrying crude or refined products?

2. Pilot-Leg Definition

Can the Board confirm that pilotage should be ordered berth/anchorage → pilot station (and vice versa) rather than port-to-port across national jurisdictions, so agents and vessel operators have clarity?

3. Dual-Pilot Presence

Is the Board expecting both Canadian and Puget Sound pilots to remain on board an “**unladen**” tanker from Port Angeles through Haro Strait and Boundary Pass? We wish to advise that an unladen tanker must tender its Notice of Readiness (NOR) at Victoria Pilot Station (Brotchie) to satisfy charter-party obligations. If the vessel bypasses Brotchie, it cannot declare readiness to shippers.

4. Interaction with SB 5801

If SB 5801 is enacted and signed by the Governor, will the 25th of April Notice remains in force, or will it be withdrawn or amended?

Clear guidance on these points will ensure that vessel owners and agents plan cross-border voyages efficiently, avoid unintended environmental impacts and confusion, and remain in full compliance with U.S. and Canadian regulations.

The Chamber of Shipping stands ready to collaborate with the Board and other stakeholders to align pilotage practices with both the intent of *RCW 88.16.170* and long-standing customary procedure.

Thank you for your attention. We look forward to your response.

Yours Sincerely,



Bonnie Gee

Chamber of Shipping

