06 May 2019,

Members of the Standing Committee on Transport and Communications  
C/O Mrs. Joëlle Nadeau  
Senate of Canada  
Ottawa, ON K1A 0A6  

Dear Mrs. Nadeau,

Re: Amendments to the *Pilotage Act* Proposed as Part of the Budget Implementation Act

The Canadian Marine Pilots’ Association (CMPA) is the professional body that represents Canada’s licensed marine pilots on matters of relevance to the piloting profession whether expressed through legislation, regulation, policy reviews or industry consultations. The CMPA also represents Canada’s pilots within the International Maritime Pilots’ Association (IMPA), which includes pilots from over 50 countries; incidentally, I have also been serving as IMPA’s President since 2014.

We understand that the amendments to the *Pilotage Act* tabled in the *Budget Implementation Act* (BIA) have now been referred to the Committee for pre-study. The CMPA has carefully reviewed these amendments and fully supports them. We recognize that the amendments are the result of a long process of consultation and analysis, and we appreciate the care shown to ensure that the views of all stakeholders were taken into account.

An important quality of the amendments as a whole is the balance that has been struck between a paramount regard for safety and the needs of industry for an efficient system. Nowhere is this balance better demonstrated than in article 226 of the BIA which amends section 2 of the Act in order to set out the principles by which the provision of pilotage services is to be governed. Specifically, the principles require that pilotage services be provided in a manner that promotes safety, but also do so in an efficient and cost effective manner. This reflects accommodation made by all parties, with each party able to see their interests represented in the result. Moreover, remarkable balance has also been established between the interests of the marine transportation sector and the public interest, in that the principles also require the delivery of services in a manner that protects human health, property and the environment.
I wish to emphasize that the Association not only fully supports the proposed amendments, but also the fact that they actually constitute in our view a single package that cannot easily be changed without disrupting the remarkable equilibrium achieved through the process undertaken. Because of this, we are not suggesting changes to the proposed legislation, and we believe that other parties should also respect the integrity of the whole that was put forward.

What is perhaps most gratifying about the proposed amendments is that the changes to the *Pilotage Act* will contribute to further Canada’s economic prosperity by optimizing our capacity to trade competitively and responsibly. In particular, the amendments enhance the safety of marine transportation to facilitate the movement of such dangerous cargo as petroleum products, while reflecting the preoccupations of the Canadian public for environmentally-responsible practices.

Yours very sincerely,

Simon Pelletier  
President