



January 13, 2014

Honourable Mary Polak
Ministry of Environment
PO Box 9047, Stn Prov Govt
Victoria, BC V8W 9E2

Dear Minister Polak,

I am writing on behalf of the UBCM Environment Committee regarding the Land Based Spill Response. Since 1992 resolutions regarding spill response have been endorsed by our members, which represent 100% of local governments in BC.

In November 2012, the Province released a policy intentions paper on Land Based Spill Preparedness and Response which seeks to create:

- A world leading regime for land based spill response
- A 100% Polluter Pay model
- Effective government oversight and co-ordination of industry spill response
- Effective and efficient rules for restoration of the environment following a spill

UBCM provided comments on the first Intentions Paper (2013) and advised that local governments support the Province's proposal to shift to a polluter pay principle and ensure an adequate level of annual funding to respond to spills across the province. Additionally, UBCM supports an increase in emergency response staff and stronger environmental restoration in the case of a spill.

In spring 2013 an Advisory Group was created, and UBCM was invited to join. Since then UBCM has participated on a number of Advisory Group meetings, including the most recent meeting on December 19th. At this meeting we were informed that industry representatives have expressed concerns regarding some of the proposed elements of a world leading Land Based Spill Preparedness and Response plan including the degree of industry-funded spill response.

I am writing to you at this time to restate UBCM's position regarding the creation of a world leading regime for land based spill preparedness and response that is in fact a 100% Polluter Pay model that will provide effective and timely response. Local governments are often the first responders and feel the strongest impact of any spill. Specifically, we are interested in a spill response that includes:

- A BC-based industry-funded contingency fund
- Response plans for high-risk areas
- A collaborative approach to spill response
- A regional planning authority to oversee spill response
- Wildlife system and ecosystem restoration funded by industry

Thank you for considering our concerns prior to the creation of the Second Intentions Paper (2014) for our world leading land based spill preparedness and response. We trust that the interests of local communities throughout BC will be a key concern as the Land Based Spill Preparedness and Response plan is designed.

Best regards,

A handwritten signature in black ink, appearing to read 'Sharon Gaetz', with a stylized flourish at the end.

Sharon Gaetz, Chair
Environment Committee, UBCM

cc: Jim Hofweber, Executive Director, Environmental Emergencies and Land Remediation Branch, Ministry of Environment