



January 20, 2015

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 Province's Land Based Spill Preparedness and Response regime.

Our membership has endorsed numerous resolutions on spill response dating back to 1992, and continues to have a significant interest in this issue. We have provided comments on both of the intentions papers, and have represented local government interests on the Provincial Land Based Spills Advisory Group.

I understand that a Cabinet Sub-Committee will be meeting to discuss the next steps for land based spill preparedness and response in BC. Given that upcoming meeting, I am writing to you at this time to reiterate UBCM's position on this issue.

First, we strongly encourage you to establish an oversight organization that is provincially led, and industry funded. The Ministry of Environment should be the responsible party for ensuring compliance and enforcement of the regime. We do not support the Canadian Energy Pipelines Association (CEPA) and Railway Association recommendation that an Industry Steering Committee oversee land based oil spill prevention, preparedness, response and recovery.

Second, we request that you adopt a BC- based contingency fund that is 100% funded by industry. Local governments are often the first responders and feel the strongest impact of any spill. As such, we ask that the provincial government ensure 100% cost recovery mechanisms for local governments who have expended their own resources to clean up spills in their communities.

Third, we understand that the liquid natural gas (LNG) industry may not be required to participate in the regime. Our membership requests that any applications to expand the amount of oil transported by pipeline or tanker in British Columbia undergo the highest degree of environmental assessment; and meaningful public consultation, including direct engagement with affected municipalities, regional authorities and British Columbia First Nations (2011-LR6)

Lastly, we are interested in a spill response that includes:

- 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
- An increase in emergency response staff and stronger environmental restoration in the case of a spill.

Thank you for considering our concerns and interests. Should you have any questions about UBCM's position, please contact our staff support, Marylyn Chiang, at mchiang@ubcm.ca.

Best regards,



Rhona Martin, Chair
Environment Committee, UBCM

cc: Hon. Rich Coleman, Minister of Natural Gas Development

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

Graham Knox, Director, Environmental Emergency Program