

## Marine Forest Accommodations

In January 2019, Transport Canada issued the following information regarding floating camps:

Bringing floating logging camp into regulatory compliance (as required by the Canada Shipping Act 2001) has been discussed a few times at various MFSAG meetings, and we're writing to you in this regard.

Logging camps, fishing lodges and other types of floating accommodation have long operated in British Columbia outside of the regulatory process; in part because they were not considered vessels under the Canada Shipping Act. Typically, most camps make one or more positioning voyages per year. There was an understanding that as long as these voyages were unmanned, the safe construction, outfitting, and operation of these lodges would be adequately covered by the locally applicable municipal, provincial and WorksafeBC requirements for safety.

<u>The Canada Shipping Act (2001)</u> came into effect in 2007, and with it the definition of a "vessel" changed. The new definition includes vessels which make occasional voyages and are capable of navigation; regardless of the ability to self-propel. Those which provide accommodation to loggers and associated workers are defined as passenger vessels and must meet the relevant safety regulations for this type of vessel. Your logging camp fits within this category.

We have not yet inspected your vessels but based upon our experience with other similar logging camps, chances are that there are significant non-compliances with several regulations. We understand that regulatory compliance can be a challenge for this type of vessel, however any non-compliances must be addressed in order for operations to continue.

There is a Marine Technical Review Board (MTRB) process which can be used in cases where full compliance is not feasible. It allows an alternative safety regime based on equivalent levels of safety. The following link will provide more information on the process: Marine Technical Review Board (MTRB). Determination of equivalent levels of safety and development of an MTRB submission can be complicated, and if you are unfamiliar with Transport Canada's marine regulatory requirements then we strongly encourage you to engage a marine consultant or naval architecture firm.

To this end we would like you put a time based compliance plan in place, and would recommend that you move expeditiously in order to have the appropriate approvals in place as soon as possible, since this will allow you to continue operating.

In response, the forest industry hosted a Marine Accommodation Vessel Forest Industry Workshop in April 2019 and extended an open invitation to licensees, contractors and service providers to discuss opportunities for improving safety of accommodations in marine forest operations. The workshop discussion included:

- History of marine forestry camps
- Transportation Canada requirements
- Accommodation vessel current industry status (dacum workshop format)
- Next steps