

## Main Identity

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**From:** "rick smith" <prsails@shaw.ca>  
**To:** <webmaster@facscalgary.org>  
**Sent:** Wednesday, March 11, 2009 10:38 PM  
**Subject:** Fw: SNSYC - "Grey Water" Issue

From Adrian Kershaw, Commodore

Pat Shera is our representative on the Council of BC Yacht Clubs. He reports that at their recent meeting, the following issue was discussed at length.

In response to pressure from adjacent landowners to regulate grey water discharge from float homes on Sushwap Lake, BC Environment is proceeding with legislation to **prohibit all grey water discharge in all BC waters, including salt water**. "Grey water" includes all discharge of wash, shower or sink water. "Black water" is water containing sewage. Discussions between the Ministry and reps of the Council and BC Marine Trades Assoc have not been productive.

Therefore, the Council is recommending that its members and their clubs' members write individual letters to the Minister relaying concern about the proposed regulation. To receive the greatest attention, individual letters (not group, not email) are recommended. Relevant information points are included below, individuals may modify according to their own priorities.

I am asking that SNSYC members write to the Ministry of Environment, protesting the imposition of these regulations in the salt water environment.

The Council of BC Yacht Clubs has developed a boilerplate letter below - please use it as you see fit.

I'd encourage you to write a letter rather than email - letters make a bigger impact in the Minister's office!

I don't have to rehearse for you what impact this regulation would have on our boating activities, save to say that I'd have to sell my boat!

Best regards, Adrian

SAMPLE LETTER BELOW:

Honourable Barry Penner  
Minister of Environment  
P.O. Box 9048, STN PROV GOVT  
Victoria, BC V8W 9E2

Dear Sir,

I have just recently learned of your department's decision to apply a ban on

the discharge of grey water from all boats in coastal waters as of 2010. This information is alarming and will have dire consequences on recreational boating in BC coastal waters if allowed to proceed.

There are several reasons for my concern and objection to the decision.

- Discharge of sewage, black or grey water, is the responsibility of Transport Canada by way of regulations to the Canada Shipping Act as it applies to vessels under 400 gross tons. Currently grey water discharge is not prohibited. Your department is exceeding its jurisdictional right by applying an inland water problem to coastal, federally regulated waters.
- There is no scientific evidence that grey water discharged in coastal salt waters has any detrimental effect on the marine environment. "The Clean Boating Act of 2008 (S.2766)" in the USA has exempted recreational boats from its regulations regarding grey water and not as stated in the brochure provided by your department.
- The grey water concern is a freshwater issue as evidenced by your own department's information. That concern has not been widely circulated to recreational boaters in BC.
- The retrofitting of vessels to comply is all but technically impossible in smaller vessels, not to mention the costs involved.
- The lack of pump out facilities in coastal BC makes compliance all but impossible. There does not appear to be any proposal from your government to remedy the situation arguing lack of funding or responsibility.
- The impact of this decision on marine tourism, and there are thousands of recreational boat visitors each year, would have a major impact on the industry. Many facilities, up and down the coast, rely on American vessels visiting our waters each year.

I urge you to reconsider this ill-advised action relating to discharge of grey water in coastal waters and to instruct your department personnel to immediately inform recreational boaters that the proposed regulatory language will not apply to vessels plying coastal BC waters.

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Adrian Kershaw