

MARTIN PETERS

BARRISTER

502-602 West Hastings Street, Vancouver, B.C. V6B 1P2
Tel: 604-682-6555 Fax: 1-866-826-2909 email: jmartinpeters@gmail.com

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Barry D Smith

A/Regional Director
Environmental Protection Operations
Environment Canada
Pacific and Yukon Region
5th floor, 401 Burrard St.
Vancouver, BC, V6C 3S5
barry.smith@ec.gc.ca

Environmental Protection Operations Directorate

Marine Programs Unit / Disposal at Sea
Environment Canada
No. 201 - 401 Burrard Street
Vancouver, British Columbia
V6C 3S5

Environmental Protection Operations Directorate

Environment Canada
Place Vincent Massey
351 St. Joseph Blvd., 17th Floor
Gatineau, Quebec
K1A 0H3

Disposal at Sea Permit No. 4543-2-03607

**Re: Notice of Objection
Request for Board of Review**

Dear Sir/Madame,

This letter serves as a Notice of Objection and request for the convening of a board of review relating to the permit issued to the Artificial Reef Society of B.C. to sink the ex-*HMCS Annapolis* in Halkett Bay Marine Park, off Gambier Island in B.C.

My clients are the Save Halkett Bay Marine Park Society. We submit that Environment Canada has not sufficiently established whether the ship is free of contaminants.

We understand that there was some initial testing for polychlorinated biphenyls (PCBs) on or around June 2013 but have not to date received a copy of this report. We find this lack of transparency shocking in light of the clear requirement for stakeholder consultation in Environment Canada's Disposal at Sea Regulations.

- How can we know if the initial sampling was extensive? Without directed testing in areas where PCBs typically are concentrated, why would we accept that the initial testing has been complete?
- Why would we accept that simply confirming the removal of a certain type of insulation coating is an assurance that the ship currently contains legal or lower levels of PCBs?

The Ministry has provided a lawyer's letter to confirm that certain insulation has been removed. We assert that this is not good enough, as it provides no validation that the ship is otherwise safe to sink.

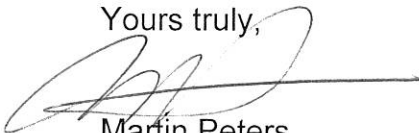
In the face of world-wide contamination issues associated with sinking ex-naval ships of this vintage, we contend that the onus is on Environment Canada to demonstrate that this ship is legally fit to sink in terms of allowable PCBs and/or other toxic materials that may be contained within the vessel's solid-state components or in other areas.

To help this process, we are offering a team of hazardous materials experts to survey the ship at our expense. We believe Environment Canada would concur that a thorough surveillance of the pollution risks the Annapolis might bring would be worthwhile.

Additionally the Save Halkett Bay Marine Park Society (SHBMPS) filed a court petition October 3, 2014 that maintains the B.C. Parks Department will be in violation of the BC Parks Act if it issues a permit for the disposal of the Annapolis in the protected park.

We respectfully request that the permit granted to the Artificial Reef Society of B.C. be suspended until such time as the petition is fully heard before a Board of Review.

Yours truly,



Martin Peters,
Counsel to the Save Halkett Bay Marine Park Society