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**STEPHANIE KUSIE, M.P.**  
**CALGARY MIDNAPORE**

Hon. Omar Alghabra, P.C., M.P.  
Minister of Transport  
House of Commons  
Ottawa, Ontario K1A 0A6

May 31, 2021

Dear Minister Alghabra,

I would like to bring to your attention an urgent issue regarding impending ballast water regulations for domestic and Great Lake vessels.

Ballast Water treatment systems on vessels are intended to prevent invasive species traveling between ecosystems as ships travel internationally. It is unreasonable to apply these requirements to vessels traveling only within the St. Lawrence Seaway as it is the same ecosystem. The regulations set out in the Canada Gazette I June 2019 go beyond the obligations set out in the International Maritime Organization's (IMO) convention on ballast water and will have devastating effect on Canadian shippers in the St. Lawrence Seaway.

These regulations on ballast water should not be applied to vessels in the St. Lawrence Seaway as the IMO's ballast water convention does not require countries to apply the standard to internal waterways, such as rivers and lakes. This is in line with other IMO conventions that they only apply as far east as Anticosti Island in the Gulf of the Saint Lawrence, and that everything west of that point, including all of the Great Lakes, is exempt. The convention also allows countries some leeway as to how, and to what ships, they will apply the convention.

If these regulations on ballast water are applied to vessels in the St. Lawrence Seaway, it will have a devastating impact on ship operators in the region. Along with the high cost for ship operators, installing a ballast water treatment system on freshwater vessels is very complex and existing technologies are not proving effective. There are also technical constraints and space restrictions on board many of these ships which will make installation very difficult.

Additionally, the current regulations are not harmonized with the United States, whose ships also use the St. Lawrence Seaway. With different regulations between the jurisdictions it will put our Canadian ship operators at a significant disadvantage and potentially impact trade between Canada and United States.

I request that you take action immediately and not impose the ballast water regulations on vessels traveling only within the St. Lawrence Seaway. I look forward to your response and hope to be included in future updates on this issue.

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Sincerely,



Stephanie Kusie, M.P.  
Shadow Minister for Transport