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CANADA

A REPORT ON THE CLOSURE OF THE COMOX MARINE COMMUNICATIONS AND TRAFFIC SERVICES CENTRE

Report of the Standing Committee on Fisheries and Oceans

**Scott Simms
Chair**

MAY 2016

42nd PARLIAMENT, 1st SESSION

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THE STANDING COMMITTEE ON FISHERIES AND OCEANS

has the honour to present its

THIRD REPORT

Pursuant to its mandate under Standing Order 108(2), the Committee has studied the closure of the Comox Marine Communications and Traffic Services Centre and has agreed to report the following:

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A REPORT ON THE CLOSURE OF THE COMOX MARINE COMMUNICATIONS AND TRAFFIC SERVICES CENTRE

Introduction

On 18 February 2016, the House of Commons Standing Committee on Fisheries and Oceans (the Committee) agreed to “undertake a study to review the imminent closure of the Comox MCTS [Marine Communications and Traffic Services] station of the Canadian Coast Guard; and that the Committee report its findings to the House.”¹

The Committee began its study on 10 March 2016. It held two meetings and finished hearing from witnesses on 12 April 2016. Witnesses included officials from the Canadian Coast Guard (CCG), representatives of Unifor Local 2182, the Officer in Charge at the Comox MCTS centre, and Mr. Fred Moxey, retired Coast Guard superintendent.

The Committee would like to express its sincere thanks to the witnesses who appeared before it to share their perspectives. This report is based on their testimony.

Background

A. Role of Marine Communications and Traffic Services

Marine Communications and Traffic Services centres provide “distress and safety call monitoring and coordinate responses, broadcast maritime safety information (weather and navigational warnings), screen vessels entering Canadian waters, deliver information and advice to regulate marine traffic movement, and take appropriate action to ensure the safe and efficient movement of vessels in Canadian waters.”²

B. Committee interest in Marine Communications and Traffic Services

Marine Communications and Traffic Services have been the focus of this committee’s work in 2003 and 2004.³ At that time, the Committee believed that short staffing and equipment rust-out were “compromising the efficient and effective functioning of MCTS.”⁴ Therefore, in its 2003 report, the Committee recommended an increase of staffing levels, the modernization of equipment and proper backup capacity to reduce the risk of service blackouts.

1 House of Commons, Standing Committee on Fisheries and Oceans, [Minutes of Proceedings](#), 18 February 2016.

2 Canadian Coast Guard [CCG], [Marine Communications and Traffic Services MCTS](#).

3 House of Commons, Standing Committee on Fisheries and Oceans, [Canadian Coast Guard and Marine Communications and Traffic Services](#), February 2003, and House of Commons, Standing Committee on Fisheries and Oceans, [Safe, Secure, Sovereign: Reinventing the Canadian Coast Guard](#), March 2004.

4 House of Commons, Standing Committee on Fisheries and Oceans, [Canadian Coast Guard and Marine Communications and Traffic Services](#), February 2003.

C. Modernization of MCTS infrastructure

In 2007, the CCG began modernizing the MCTS infrastructure.⁵ The project involves, in the Western Region, the consolidation of the five MCTS centres in Tofino, Comox, Vancouver, Victoria and Prince Rupert into two updated centres in Victoria and Prince Rupert.⁶ To date, the consolidation of the Tofino and Vancouver centres has been completed and the integration of the Comox centre into the Victoria centre represents the final element of this modernization project.⁷

Closure of the Comox MCTS Centre

During the hearings, the Committee heard conflicting opinions regarding the impacts of the planned closure of the Comox MCTS centre on safety of mariners, safety of the environment, sustainability of the MCTS infrastructure and human resources, efficiency of operations, and backup capacity.

A. Safety of mariners

The Committee heard from the CCG that the consolidation project is based on the principle that there would be no change to existing radio towers and radar installations.⁸ The CCG also stressed that there will be no change in response to distress situations.⁹

Unifor mentioned that there have been audio quality issues with the new communications system that could impact safety of mariners.¹⁰ The CCG acknowledged these technical issues but indicated that there has also been progress in resolving them.¹¹ Unifor agreed that technical issues will eventually be fixed but added that one of its crucial concerns is the greater noise level in the Victoria centre's operations room resulting from increased radio transmissions volume.¹² According to Unifor, the high noise level could impede the detection of certain distress calls.¹³ The CCG, for its part, reassured the Committee that, post-consolidation, the ratio of responding officers and radio transmissions volume will remain unchanged.¹⁴

5 Gregory Lick, Director General, Operations, Canadian Coast Guard, [Evidence](#), 10 March 2016.

6 CCG, [Marine Communications and Traffic Services MCTS](#).

7 Jody Thomas, Commissioner, Canadian Coast Guard, [Evidence](#), 12 April 2016.

8 Gregory Lick, Director General, Operations, Canadian Coast Guard, [Evidence](#), 10 March 2016.

9 [Ibid.](#)

10 Allan Hughes, President, Local 2182, Unifor, [Evidence](#), 12 April 2016.

11 Jody Thomas, Commissioner, Canadian Coast Guard, [Evidence](#), 12 April 2016.

12 Allan Hughes, President, Local 2182, Unifor, [Evidence](#), 12 April 2016.

13 [Ibid.](#)

14 Jody Thomas, Commissioner, Canadian Coast Guard, [Evidence](#), 12 April 2016.

Unifor stated that knowledge of the local geography is another important factor for ensuring the safety of mariners.¹⁵ Given that a number of officers will not relocate from Comox to Victoria, Unifor was concerned about the potential loss of local knowledge. The CCG indicated, however, that the consolidated Victoria centre will have officers trained to monitor specific areas “just as if the Comox station was still opened.”¹⁶

B. Safety of the environment

The Committee heard from Unifor that the Regional Marine Information Centre (RMIC) responsible for pollution alerting was moved to Comox when the Vancouver centre was closed.¹⁷ The CCG informed the Committee that the consolidation project will have no impact on safety of the environment since RMIC will be transferred to the Regional Operations Centre.¹⁸ It also mentioned that the response to environmental incidents “has not changed anywhere across the country because of our consolidation efforts.”¹⁹

C. Sustainability of the MCTS infrastructure and human resources

The Committee heard that long-standing short staffing, workload and overtime problems at MCTS could be exacerbated with the consolidation project.²⁰ The Officer in Charge of the Comox centre indicated that 50% of vessel movements in Canada occur in the Western Region, and that the consolidated Victoria centre will handle 83% of vessel movements and the highest concentration of incidents in the Western Region.²¹

Mr. Dale Gross added that the CCG has not been able to staff safety and traffic positions with the required 5.5 persons on average which resulted in “excessive” overtime.²² Unifor pointed out that the 2003 Committee report made a recommendation to staff seven persons per position.²³ It also predicted a loss of 20% to 30% of officers due to retirements and departures within the next two to three years in Victoria and informed the Committee that the process to hire and train a new officer could take up to two years.²⁴

The CCG indicated that it has added “surge capacity” at each centre to deal with peak periods and that the overtime issue will “normalize” within six to eight months after

15 Scott Hodge, Vice-President, Local 2182 – Western Region, Unifor, [Evidence](#), 10 March 2016.

16 Jody Thomas, Commissioner, Canadian Coast Guard, [Evidence](#), 12 April 2016.

17 Allan Hughes, President, Local 2182, Unifor, [Evidence](#), 12 April 2016.

18 Brian Bain, Superintendent, MCTS Western Region, Canadian Coast Guard, [Evidence](#), 12 April 2016.

19 Gregory Lick, Director General, Operations, Canadian Coast Guard, [Evidence](#), 10 March 2016.

20 Dale Gross, Officer in Charge, Comox MCTS Centre, Canadian Coast Guard, [Evidence](#), 10 March 2016.

21 [Ibid.](#)

22 [Ibid.](#)

23 Scott Hodge, Vice-President, Local 2182 – Western Region, Unifor, [Evidence](#), 10 March 2016.

24 Allan Hughes, President, Local 2182, Unifor, [Evidence](#), 12 April 2016.

completion of the modernization project.²⁵ According to the CCG’s 2009 workload study,²⁶ “staffing levels and workload at the new centres are appropriate for the area that they cover.”²⁷ In addition, it was pointed out that modernized equipment enabling text-to-speech marine weather broadcasts would decrease officers’ workload and allow them to focus on distress duties.²⁸ The Committee also heard from the CCG that a succession plan is in place to address expected retirements and departures.²⁹

With respect to the sustainability of the MCTS infrastructure, the CCG emphasized that this modernization project will result in a system that would be “not only more reliable, but flexible and adaptable.”³⁰

D. Efficiency of MCTS operations

The CCG measures efficiency in its delivery of services by the number of staff and funds allocated for a particular operation.³¹ According to the Commissioner, the implementation of the new technology, by allowing the merging of 22 centres into 12 without change in services to mariners, “increased efficiency of the overall MCTS program.”³²

In contrast, Unifor indicated that the cost associated with the relocation of staff and equipment to Victoria, which includes overtime costs due to staffing shortage in Victoria and new officers’ training expenses, “far outweighs” the cost of keeping the Comox centre opened.³³ The union added that it is not opposed to the modernization project but, if it had been consulted, it would instead suggest to consolidate the Vancouver centre with Victoria and to move Tofino’s operations to Comox due to low staff retention in Prince Rupert and in Vancouver, and the need to replace the building in Tofino.³⁴

E. Backup capacity

Unifor stated that the Comox centre currently acts as emergency backup for British Columbia’s Emergency Preparedness, Response & Recovery as it broadcasts tsunami warnings for the provincial agency.³⁵ Mr. Fred Moxey added that it is necessary

25 Jody Thomas, Commissioner, Canadian Coast Guard, [Evidence](#), 12 April 2016.

26 [Ibid.](#)

27 Gregory Lick, Director General, Operations, Canadian Coast Guard, [Evidence](#), 10 March 2016.

28 [Ibid.](#)

29 Mario Pelletier, Deputy Commissioner, Operations, Canadian Coast Guard, [Evidence](#), 12 April 2016.

30 Jody Thomas, Commissioner, Canadian Coast Guard, [Evidence](#), 12 April 2016.

31 Gregory Lick, Director General, Operations, Canadian Coast Guard, [Evidence](#), 10 March 2016.

32 Jody Thomas, Commissioner, Canadian Coast Guard, [Evidence](#), 12 April 2016.

33 Scott Hodge, Vice-President, Local 2182 – Western Region, Unifor, [Evidence](#), 10 March 2016.

34 [Ibid.](#)

35 [Ibid.](#)

to have the Comox centre as backup for the Victoria and Prince Rupert centres.³⁶ He characterized the Comox centre as a “lifeboat” that is more likely to survive a disaster since it has been “seismically upgraded”. Unifor also indicated that, if either the Victoria or Prince Rupert centre goes down or blackouts, the workload and vessel traffic complexity would be “too great” to handle for the sole remaining MCTS centre in the Western Region.³⁷

Concerning tsunami risks, the CCG informed the Committee that the Victoria centre is not located in a tsunami planning zone and that the Prince Rupert centre is “sheltered due to the number and location of islands at the entrance to the port.”³⁸ In Prince Rupert, the tsunami risk was judged as “acceptable” by the CCG since it predicts that the “traffic will not be there in the event of a tsunami.”³⁹

Conclusion

The Committee notes the often diametrically opposed views between witnesses. Mr. Fred Moxey summed the perspectives of opponents to the closure of the Comox centre by stating that “it all depends on how much risk the government [is] willing to take.”⁴⁰ For its part, the CCG noted the success of previous MCTS consolidations across Canada and deemed its decision as a “reasonable” one as it “does not compromise safety.”⁴¹

Recommendations

Recommendation 1

The House of Commons Standing Committee on Fisheries and Oceans recommends that the Canadian Coast Guard monitor the performance of the MCTS system in British Columbia for a period of 24 months. This will allow for the resolution of issues related to technology, mariner safety, workload and training.

Recommendation 2

The House of Commons Standing Committee on Fisheries and Oceans recommends that the Canadian Coast Guard and Unifor continue to work together in monitoring and resolving technical issues (e.g. audio quality problems) and take appropriate actions to ensure the safe and efficient movement of vessels.

36 Fred Moxey, As an Individual, [Evidence](#), 12 April 2016.

37 Scott Hodge, Vice-President, Local 2182 – Western Region, Unifor, [Evidence](#), 10 March 2016.

38 Jody Thomas, Commissioner, Canadian Coast Guard, [Evidence](#), 12 April 2016.

39 Roger Girouard, Assistant Commissioner, Canadian Coast Guard, [Evidence](#), 10 March 2016.

40 Fred Moxey, As an Individual, [Evidence](#), 12 April 2016.

41 Jody Thomas, Commissioner, Canadian Coast Guard, [Evidence](#), 12 April 2016.

Recommendation 3

The House of Commons Standing Committee on Fisheries and Oceans recommends the Canadian Coast Guard to proceed with the planned closure of the Comox MCTS centre with caution. The Committee has been sufficiently reassured that the capacity of the Canadian Coast Guard to respond to emergency situations has not diminished.

Recommendation 4

The House of Commons Standing Committee on Fisheries and Oceans recommends that, given the significant differences in opinion expressed by the Canadian Coast Guard and the other witnesses, all stakeholders collaborate on post-consolidation assessments that will include:

- working conditions at the consolidated Victoria MCTS centre in Sidney;**
- records of staffing levels on all shifts, records of overtime and records of staff attrition/turn-over;**
- the efficacy of the MCTS officers recruiting process; and**
- the nature, scope and causes of communications system outages, noting unique and recurring issues,**

and that a risk assessment of the consolidation project in the Western Region be completed on an annual basis.

Recommendation 5

The House of Commons Standing Committee on Fisheries and Oceans recommends that reports compiled by the post-consolidation assessments (included in Recommendation 4) be submitted to the Minister of Fisheries, Oceans and the Canadian Coast Guard and the House of Commons Standing Committee on Fisheries and Oceans on a quarterly basis for the next 24 months.

Recommendation 6

The House of Commons Standing Committee on Fisheries and Oceans recommends that Fisheries and Oceans Canada establish a mechanism for continuous feedback from stakeholders on the overall performance of the MCTS system across Canada and be part of the department's annual performance report.

APPENDIX A LIST OF WITNESSES

Organizations and Individuals	Date	Meeting
Department of Fisheries and Oceans Roger Girouard, Assistant Commissioner Canadian Coast Guard Dale Gross, Officer In Charge Programs - MCTS - Canadian Coast Guard Gregory Lick, Director General Operations Canadian Coast Guard Sam Ryan, Director General Integrated Technical Services	2016/03/10	6
Unifor Scott Hodge, Vice-President Western Region - Local 2182		
Department of Fisheries and Oceans Brian Bain, Superintendent MCTS Western Region Mario Pelletier, Deputy Commissioner Operations Jody Thomas, Commissioner Canadian Coast Guard	2016/04/12	7
Unifor Allan Hughes, President Local 2182		
As an individual Fred Moxey, Retired Canadian Coast Guard Commander		

APPENDIX B LIST OF BRIEFS

Organizations and Individuals

Unifor

REQUEST FOR GOVERNMENT RESPONSE

Pursuant to Standing Order 109, the Committee requests that the government table a comprehensive response to this Report.

A copy of the relevant Minutes of Proceedings ([Meetings Nos. 6, 7, 8, 10, 11](#)) is tabled.

Respectfully submitted,

Scott Simms
Chair

DISSENTING OPINION FROM THE NEW DEMOCRATIC PARTY

The New Democratic Party would like to thank the witnesses that appeared before committee on this study.

The federal government is proceeding with its plan to consolidate the first, second and fourth-busiest Canadian Coast Guard Marine Communications and Traffic Service (MCTS) centres in the country into one super centre in Victoria. This is the only location in Canada where three MCTS centres are being merged into one. Every other amalgamation across the country combined two centres, not three. This final merger goes too far. Victoria will be carrying over 40% of the MCTS workload of the entire country and handling 83% of vessel movements in the Western Region. (see map)

In his mandate letter the Minister was asked to improve marine safety. Witnesses testified that this closure will be a detriment to the safety of Canadians on the West Coast. Currently out of the 6,000 search and rescue incidents that occur annually in Canada, approximately 1,000 of those are handled by Comox. Closing this busy centre increases the risk to mariner safety.

Comox is the only MCTS centre in British Columbia that is not in a tsunami zone. A risk assessment to ensure that in the event of a tsunami with damage and destruction, the two remaining centres in Prince Rupert and Victoria would remain operational, has never been done. The Comox station is the newest MCTS building and was built to post-disaster standards. It acts as emergency backup for British Columbia's Emergency Preparedness, Response & Recovery system, broadcasting tsunami warnings for the provincial agency. Mariners consider the Comox Station the lifeboat of Vancouver Island in emergencies.

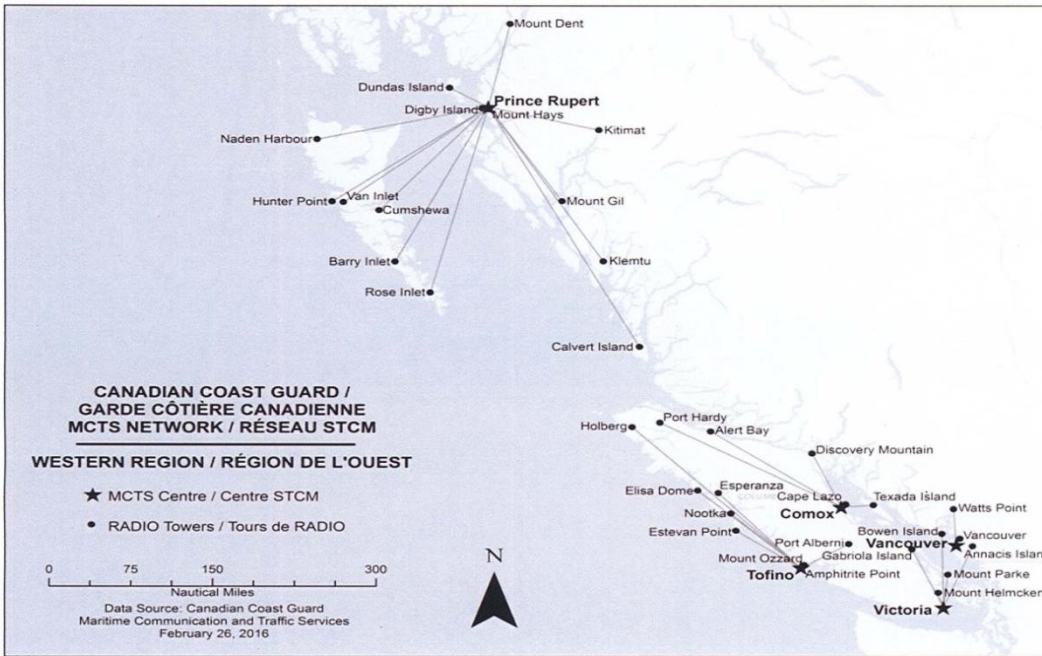
Currently there are five operating positions at the MCTS Centre in Victoria. Once the consolidation is complete, in the same room where there are five stations, there will be ten. The noise levels will be very high. Operators testified that they are worried about working in Victoria due to these increased noise levels. The more noise an operator must deal with the harder it is for him/her to determine a distress call. Witnesses testified that staff shortages will result in excessive overtime causing health issues and fatigue. This will impact the safety of workers and the entire B.C coast.

Closing the MCTS Comox centre will result in a loss of local knowledge for the Canadian Coast Guard which we heard from witnesses is critical to the safety of mariners on the West Coast. This is the busiest search and rescue jurisdiction in Canada and it is imperative staff do not waste valuable time going back and forth with mariners in distress to determine their exact location. Local people often use local names for places. For instance, in the Comox vessel traffic zone, there are two places called Twin Islands, two places called God's Pocket, and two places called Hole-in-the-

Wall. The loss of this local geographical knowledge cannot be replaced. The relationships you build on the ground are also vital to support the work of the Coast Guard. A witness testified that being able to ask a neighbour to look out their window to confirm a problem is invaluable. The consolidation of MCTS centres means these relationships will be lost.

Recommendation: *It is the opinion of the New Democratic Party that the Comox Marine Communications and Traffic Service (MCTS) centre should remain open in order to ensure mariner safety, environmental protection and back-up emergency assistance to the West Coast.*

PRE-CONSOLIDATION OF COMOX



POST-CONSOLIDATION OF COMOX

