



**Backgrounder for a Presentation to the
Senate Standing Committee on Fisheries and Oceans**

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By

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1. The Union of Canadian Transportation Employees (UCTE)

UCTE is the national union for most of the unionized Coast Guard workers. We are a large and diverse transportation union with over 70 bargaining units. We were the original union for Transport Canada and given all the divestitures and transfers from that department our members now work in many departments and agencies, including Coast Guard, Transport Canada, Nav Canada, Transportation Safety Board, Canadian Transportation Agency, and Canada's airports. UCTE is part of the Public Service Alliance of Canada. UCTE represents the Light Keepers that work for the Canadian Coast Guard.

2. The Study by the Senate Committee

When Minister Shea appeared before the Committee on April 13 she indicated that the Terms of Reference for the study were to review the Canadian Coast Guard (CCG) proposal to de-staff light stations and to review the impacts of this proposal from a public safety perspective. Subsequently, we understand the terms of reference have been broadened to include the plans to divest light stations, among other things. UCTE will limit its presentation to the manned light station issue and will only make references to other parts of the study (for example divestiture) when this proposed action relates to the manned light station issue.

UCTE has written Minister Shea asking that your Committee be given the budget and the time to travel to the regions of Canada most impacted by the de-staffing proposal. Key stakeholders such as aboriginal leaders, communities, aviation and marine transportation companies, fishers, community leaders, recreational boaters, and others, do not have the time or the budget to travel to Ottawa. The Committee will not hear from these critically important stakeholders if

you do not travel to them. (*Please see Attachment 1: Letter to Minister Shea*)

While this is a poor substitute for hearing opinions and seeing impacts first-hand, with this submission today we are tabling letters and petitions from groups and individuals impacted by the de-staffing proposal. We will continue to forward these letters, petitions and submissions to the Committee Clerk as we receive them.

3. Regional Representation of Committee membership

In our letter to Minister Shea we also pointed out that there was inadequate Committee representation from British Columbia. The B.C. Maritime issues, particularly as they relate to staffed light stations are quite unique. For this reason we recommend that an additional two Senators be appointed from British Columbia. We believe this will assist greatly in ensuring the B.C. perspective is effectively brought to your table.

4. Whole of Government Considerations

UCTE is quite surprised that a comprehensive study on de-staffing light stations would only focus on the direct costs to the CCG and to issues identified by the CCG as directly relevant to the CCG “mandate”.

First, Light Keepers provide services to the public that are expected for marine and public safety that could be considered as included in multiple federal mandates. For example, Light keepers provide marine safety services for Search and Rescue, Environment Canada weather monitoring, Marine Communications and Traffic Services, Fishing fleet monitoring for CCG, DFO, RCMP Coast Watch program, Environmental and Pollution response services, Data Collection and Seismic Warning for Natural Resources Canada, Scientific Research for DFO and other

research organizations and monitoring and recreational user tracking for Parks Canada. (*Please see Attachment 2: "The Role of Light station Services"*)

For this reason we recommend to the Minister and to the Committee that you take a "whole of government" perspective with respect to the staffed light station review. All these roles and responsibilities are expected by the public and provided by the federal government in support of public and marine safety. The public does not differentiate between a CCG mandate and the mandate of other federal agencies and departments. The public expects that public safety will be paramount to all government services.

It is for this reason that we strongly recommend a "whole of government" review process. This approach is in the public interest and should be critical to your study.

We would also point out that the CCG Presentations to your committee have had a very narrow perspective on the CCG "Mandate". We would encourage the Committee and its researchers to have a hard look at the CCG legislative framework and its objectives as an organization. You will note there are multiple responsibilities for Maritime search and rescue, environmental response, marine communications and traffic, aids to navigation, marine security and safety, etc.. In other words, even in the context of the CCG itself, it is wrong to look at lighthouses and light keepers from a "light and horn" perspective only.

5. The Focus on "Costs" to the CCG

The other focus that CCG has brought to your committee is again disquieting. This is the whole notion that light keepers represent a cost to CCG and that the committee should be considering its review within the context of direct and indirect cost savings to the CCG.

This completely ignores the points raised above. Light keepers perform roles that may be directly related to the mandate of another government department but are consistent with the public safety function and are indirectly related to the functions and responsibilities of CCG. For example, light keepers advise marine users and air taxi companies on localized weather conditions. The Environment Canada focus may cut too wide a geographic area and may not be localized sufficiently to provide adequate guidance given the commercial imperative to fly or transport by sea. The Light Keeper Network provides a more granular and localized travel condition report that can assist in emergency avoidance.

The bigger question is: if these public safety functions are not within the CCG mandate, then whose mandate are they within and how can these costs and benefits be properly allocated? Is it possible that the silo basis of government decision-making and accountability is interfering with sound decision-making?

In the interests of exploring the issue of CCG costs, we might also consider the issue of revenues or potential revenues. Minister Shea, when she appeared before your committee on April 13, mentioned that some fees were received by the CCG for services performed that were considered part of another departmental mandate. We would ask the following questions:

- What is the magnitude of the inter-departmental transfers and could these be increased?
- Could inter-departmental transfers be increased?
- What are present and future plans with Marine Service Fees and how do they relate to this issue?

6. Light Keepers and the cost of CCG helicopters and vessels

The CCG has repeatedly made the point that helicopters and vessels must be available and deployed to service the needs of light keepers in remote locations. While this may be true to some extent, we have to ask the question: what would these helicopters and vessels be doing if there were no light keepers? The fact is they would still be operated, maintained and in service to take care of marine navigational aids and other duties, including the automatic lights and horns that have replaced the staffed stations. The CCG makes it sound as if these expensive helicopters and vessels will be taken out of service if there are no light keepers. Again, it is imperative that this review put these comments in context. In other words, while there may be savings for certain functions- when these savings are correlated with future obligatory functions- there may be no savings at all.

7. Public Safety, Risk Management, Risk Mitigation and Cost Avoidance

Again, it is disquieting to see the light keeper issue only discussed in terms of costs to the CCG. There is no discussion of benefits, nor is there any attempt to place this issue within a larger context. For example, do we understand how the Light Keeper Network (Network) works to avoid accidents and incidents that in turn save CCG and the Government of Canada money? Do we understand how the Network provides communications and weather services to fishing vessels, thereby avoiding the costly search and rescue that could result if these services were not provided? Is it because Search and Rescue and Interdiction are not part of the CCG budget that we assume there are no savings or benefits attached to these services? Is it because risk management, risk mitigation and cost avoidance are not part of the CCG nomenclature or are not part of the policy examination of this

issue? If these issues were considered, what would the result be? Would we still be talking about savings of \$8 million per year as if this is all that government and the Senate Committee should be looking at?

8. The Real Costs of Automation

In our view it is slightly ironic that de-staffing discussions are being linked to light house divestiture. With divestiture, community groups and organizations are being asked to take over responsibility for the local light house. No federal dollars appear to be attached to this divestiture. On the other hand, automated marine navigational aid functions and services will likely remain attached to many of the divested light houses. What will the community groups expect in return from CCG for the use of the divested light house? Does CCG really think that automating and divesting will remove financial responsibility and liability? What will be the real costs of automating? All CCG talks about are the costs of staffing and de-staffing light houses; they do not talk about the real costs of the alternatives.

9. The issue of staffed light stations and other countries

CCG makes the point that all developed countries have de-staffed light houses. To what countries are they referring? European countries with coastlines are densely populated and the coastlines are small and patrolled by military vessels. This is a similar situation with the United States. If we consider Alaska as a parallel to Canada we have to recognize that compared to Canada, Alaska's coastline is relatively small and there is a large U.S. Navy and Coast Guard presence in Alaska. We should also consider that, with the exception of Alaska, water temperatures are moderate in these jurisdictions and survival in water is possible for longer periods.

What about countries with similar coast lines, geographic and climactic challenges? If we examine Chile and Argentina (with large coastlines and cold weather in the southern hemisphere), we note that staffed light stations are part of government policy and in fact are being increased, particularly in Chile.

10. Small Fishing Vessels and Public Safety

We sincerely hope the Senate Committee will ask the Transportation Safety Board (TSB) to appear and present. The TSB has expressed serious concerns about the safety of small fishing vessels and the support mechanisms in place to ensure public safety. This problem is compounded when you factor in the opening of Northern waters and the increase in aboriginal fishing in the North. Given these facts and the TSB concerns, the light keeper role in small fishing vessel information sharing and risk mitigation, including physical search and rescue functions should not be undermined or ignored.

(Please see attachment 3: TSB Presentation)

11. Light Keepers and Sovereignty and Security

Canadian sovereignty is a deep national concern, particularly as it relates to sovereignty over our northern regions. Canada has more coastline than any other nation in the world and we should be deeply concerned about our ability to effectively exercise sovereignty over our own regions. We need people in place to demonstrate sovereignty. Light Keepers are people in place and people that demonstrate our clear sovereignty over our remote coast lines.

Again, the issue of de-staffing is being looked out from a very narrow, silo-based perspective. Only a “whole of government” approach and a consideration of broader Canadian objectives and values, such as

sovereignty, will bring a more balanced perspective to the light keeper issue.

12. Staffed Light houses and the role of the federal government in remote communities

Again, we believe a broader perspective is necessary when examining this issue. The CCG alone has a \$700 million operating budget and a minimum \$150 million annual capital budget, with nearly 4500 employees. There are approximately 110 light keepers. This represents 2.4% of the CCG employees. CCG says it will save \$10 million per year by de-staffing; these savings represent 1.4% of the annual CCG operating budget. A question is: if you examined all the person years for the CCG and for DFO as a whole, what kinds of savings could be accrued (and person years reduced) by head office administrative efficiencies? What kinds of savings could be obtained by consolidating head office functions or reducing head office overheads? Why does head office always put community services on the chopper block whenever political masters are looking for savings?

The CCG is a valuable and very important Canadian institution. It brings Canadians together from coast to coast to coast. We are all proud of this incredibly important institution. The staffed light stations remaining are part of the heritage of the Coast Guard- they are part of the community service that goes to the heart of this great national institution. We sincerely hope the Senate will review the light keeper issue in this context.