



Introduction

The information below details the response from the Pacific Pilotage Authority (PPA) to the Transportation Safety Board (TSB) report [MP21P0030](#) on the sinking and loss of life – tug *Ingenika* and barge *Miller 204*.

It is important to note that the PPA has taken immediate actions to strengthen the Pilotage Waiver review process and communicated the revisions to all pilotage waiver applicants. PPA will continue to work with Transport Canada and all interested parties on the future of the Pilotage Waiver process including supporting Transport Canada with reviewing the General Pilotage Regulations.

Pacific Pilotage Authority response to the TSB report on the sinking and loss of life – tug *Ingenika* and barge *Miller 204* - [M21P0030](#)

[Recommendation M23-03:](#)

Transportation Safety Board recommends that the Pacific Pilotage Authority verify that eligibility requirements are met before issuing pilotage waivers to companies operating tugs in compulsory pilotage areas.

The Pacific Pilotage Authority (PPA) has reviewed and accepted the Recommendation M23-03. Prior to issuing pilotage waivers to vessels, the PPA ensures that navigation officers meet all requirements under Section 25.10(3) of the [General Pilotage Regulations](#) and the [PPA Pilotage Waiver Standard of Care](#). Commercial operators seeking pilotage waivers for their vessels are required to submit valid Certificates of Competency for their officers, a [‘Declaration of Compliance – new officers’](#) form (updated in April 2023) signed by an authorized representative, and provide evidence of watchkeeping time for each officer being added to the waiver. Commercial operators are also required to submit a [‘Declaration of Compliance – renewals and new applications’](#) form (updated in April 2023) signed by an authorized representative stating that they agree to ongoing compliance with the terms of the waiver. The PPA uses a checklist to track each operator’s progress through the application process, and records are uploaded to PPA’s waiver database.

It is important to note, the pilotage waiver regulatory requirement for officers’ sea time does not favourably support the domestic coastal vessels operating in the coastal waters of British Columbia. PPA is working with Transport Canada to identify a solution to permanently address this shortcoming.

[Recommendation M23-04:](#)

Transportation Safety Board recommends that the Pacific Pilotage Authority implement a process to verify ongoing compliance with waiver conditions by companies operating tugs in compulsory pilotage areas.

The Pacific Pilotage Authority (PPA) has reviewed and accepted the Recommendation M23-04. The PPA requires that all commercial vessel pilotage waivers are renewed annually through an application process. The PPA uses a database to maintain records of documents for all vessels and officers that operate under a pilotage waiver. These records are updated throughout the year and reviewed annually in consultation with the representatives of companies that operate vessels under a pilotage waiver. Commercial operators are required to submit updated vessel and officer records, and a [‘Declaration of Compliance – renewals and new applications’](#) form signed by an authorized representative. Once records are reviewed and the PPA is satisfied that all requirements under Section 25.10(3) of the [General Pilotage Regulations](#) and the [PPA Pilotage Waiver Standard of Care](#) have been met, a waiver renewal is issued. The PPA uses a checklist to track each operator’s progress through the application process, and records are uploaded to PPA’s waiver database.