

Received: December 14, 2020

Dear Mr. Bradley,

In response to the Atlantic Pilotage Authority's November 14th, 2020 announcement of Revised Service Charges in Placentia Bay, NL, The Shipping Federation of Canada is submitting the following brief comments on behalf of the owners, operators and agents of ocean ships trading between Canadian and overseas ports – significant users of the APA's service. These comments are in line with those made in our October 30th, 2020 submission, in response to your ***Detailed and Principles Regarding Proposed Revised Service Charges*** published at the end of September.

As requested in our submission of October 30th, we once again ask the Authority to request the Minister of Transport to delay the implementation of Transport Canada fees. A delay of 2 years would offer industry some relief from additional pilotage charges at no cost to the Authority, as it is a flow through charge with no cost to the APA. Secondly, we repeat our request for the Authority to look for ways to temporarily reduce the cost of delivering pilotage services, without threatening the long term viability of pilotage in the region.

With respect to the tariff process itself, "consultations" conducted by the Atlantic Pilotage Authority with the owners, operators and agents of the vessels that pay for pilotage services, was simply a meeting to advise that there were no acceptable alternatives to the Authority's proposals.

Yours truly,

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Please note, that during the COVID-19 crisis our staff is working remotely and can be reached on our individual cell phones.