



DETAILS AND PRINCIPLES REGARDING PROPOSED REVISION TO SERVICE CHARGES

GENERAL

Pursuant to section 33.2 of the *Pilotage Act*, S.C. 1985, c. P-14, the following document (“**Details and Principles**” or “**Document**”) provides additional details to expand upon the Notice of Revised Service Charges dated September 29, 2022 (the “**Notice**”). The Notice published by the Pacific Pilotage Authority (the “**Authority**”) proposes the establishment of revised charges to come into effect on January 1, 2023.

This Document includes a description of the proposal, including the Authority’s methodology in relation to establishing or revising the pilotage charges, and the circumstances in which the charges will apply (found at sections 7 and 8). In developing the charges, the Authority has observed all charging principles established under section 33.2 of the *Pilotage Act*. The pilotage charges below are based upon the current budgetary forecasts and other information and may be revised following representations obtained under section 33.3 of the *Pilotage Act*. The methodology and its application are set out in this Document for the proposed establishment of pilotage charges for 2023.

Except for the revisions proposed in the Notice, all the existing charges and related terms and calculations, as set out in the Authority’s current *Customer Guide to Charges*, continue in effect.

Persons interested in making representations to the Authority regarding the proposals set out in the Notice may do so in writing to the address set out in Section 10 and must be received by the Authority not later than close of business on **October 30, 2022**.

This Document consists of the following sections:

- 1) General overview of the Authority
- 2) Assignment volumes
- 3) Expected financial position of the Authority
- 4) Liquidity and cash reserves
- 5) Proposed revision to service charge rates
- 6) Justification of the proposal in relation to the charging principles and cost effectiveness assessment
- 7) Determination of charges
- 8) Cost of services
- 9) Consultation
- 10) Information regarding the Notice and on making representations to the Authority

1. GENERAL OVERVIEW OF THE AUTHORITY

The Authority is a non-agent Crown corporation established in 1972 pursuant to the *Pilotage Act*. As a Crown corporation listed in Schedule III Part 1 of the *Financial Administration Act*, the Authority operates in accordance with a budget and corporate plan approved each year by the Treasury Board and Governor in Council, respectively.

The objective of the Authority is to establish, operate, maintain, and administer in the interests of safety of navigation, an efficient pilotage service within the Authority's regional jurisdiction. The Authority is tasked with achieving this objective while respecting the following principles:

- a. that pilotage services be provided in a manner that promotes and contributes to the safety of navigation, including the safety of the public and marine personnel, and that protects human health, property, and the environment
- b. that pilotage services be provided in an efficient and cost-effective manner
- c. that risk management tools be used effectively and that evolving technologies be taken into consideration; and
- d. that an Authority's pilotage charges be set at levels that allow the Authority to be financially self-sufficient.

The system of governance at the Authority is intended to ensure the Authority continues to be financially self-sufficient. The Corporation is governed by a seven-member Board of Directors (the "Board"). The Governor in Council appoints the Chairperson of the Authority, for a term determined by the Governor in Council, and the Minister of Transport appoints the other members of the Board for terms not exceeding four years.

The fundamental elements governing the mandate conferred on the Authority by the *Pilotage Act* include the exclusive right to provide pilotage services to ships in an area of water where ships are subject to compulsory pilotage. This includes the exclusive ability to set and collect charges for pilotage services provided or made available by the Authority or a contractor acting for the Authority, and the obligation by the Authority to provide these services.

When establishing a new charge for pilotage services or revising an existing charge, the Authority must follow the charging principles set out in section 33.2 of the *Pilotage Act*. These principles prescribe that, among other requirements, charges must not be set at levels that, based on reasonable and prudent projections, would generate revenues exceeding the Authority's current and future financial requirements related to the provision of compulsory pilotage services. Pursuant to the charging principles, the Board approves the amount and timing of the establishment or changes to customer service charges. The Board also approves the Authority's annual budget where the amounts to be recovered through service charges for the ensuing year are determined.

In addition, the Authority proceeds to a pre-consultation exercise with the industry stakeholders prior to the approval and publication of the Notice. A summary of the pre-consultation process is included in this Document.

Pursuant to section 33.2 of the *Pilotage Act*, the Authority plans its operations to be financially self-sufficient and based on reasonable and prudent projections would not result in revenues exceeding

current and future financial requirements related to the provision of compulsory pilotage services. Financial requirements include:

- a. operations and maintenance costs
- b. management and administration costs
- c. debt servicing requirements and financial requirements arising out of contractual agreements relating to the borrowing of money
- d. capital costs and depreciation expense on capital assets
- e. financial requirements necessary for the Authority to maintain an appropriate credit rating
- f. tax liabilities
- g. payments to the Minister for the purpose of defraying the costs of the administration of the *Pilotage Act*, including the development of regulations, and the enforcement of the *Pilotage Act*
- h. reasonable reserves for future expenditures and contingencies; and
- i. other costs determined in accordance with accounting principles recommended by the Chartered Professional Accountants of Canada or its successor or assignee.

The Authority's quarterly and annual financial statements and related Management's Discussion and Analysis provide additional information on the revenues and expenses of the Authority. These documents are available at: <https://www.ppa.gc.ca/>.

2. ASSIGNMENT VOLUMES

In developing the outlook for shipping volumes, the primary source of information considered are estimates provided by terminal operators. In addition, an analysis of historical traffic patterns is compared to the estimates to obtain an additional level of precision. Forecasts of macro-economic indicators are also used where a correlation has been shown between the indicator and movements in traffic volume.

The uncertainty caused by the COVID19 pandemic over the past two years has been replaced by other factors impacting global trade and shipping patterns. A looming economic recession triggered by rising inflation and subsequently rising interest rates is combining with increased political tensions in Europe and South-East Asia and slowing economic growth in China. Although assignments year-to-date to the end of August 2022 were 4.4% above the same period in 2021, this was entirely due to the return of cruise ships. Forecasts from terminal operators for 2023 indicate a potentially significant decrease in vessel traffic in 2023.

The following table presents the Authority's historical traffic by geographic area of operation and reflects forecast assumptions for 2022 and 2023. Overall assignment volume for 2023 is forecast to decrease by 10% from levels in 2022.

District	Actual assignment volume by year with forecasts for 2022 and 2023					
	2018	2019	2020	2021	2022F	2023F
Southern	10,523	10,293	9,905	9,561	9,853	8,868
Fraser River	1,130	1,158	949	988	943	849
Rupert	1,291	1,405	1,515	1,259	1,253	1,128
Northern	521	535	367	281	452	407
Total assignments	13,465	13,391	12,736	12,089	12,501	11,251

3. EXPECTED FINANCIAL POSITION OF THE AUTHORITY

This section will include commentary about the expected financial position of the Authority with the following proposed structure:

- Discussion on forecast expenses:
 - Summary of forecast expenses
 - Table of prior years' actual and current year's forecast; and
 - Details of material changes between the prior year actual and current year forecast.
- Discussion on capital program:
 - Summary of forecast capital expenditures;
 - Details on the material elements of the capital program; and
 - Summary of the proportion of the capital program which will be financed versus internally funded.

Based on projected volumes in section 2 above, the Authority anticipates that expenses for 2023 will be \$105.3 million, as can be seen below. This represents a 1.8% increase over the forecast for 2022 and is primarily driven by the effects of inflation, offset by lower variable costs from the forecast drop in assignments.

Operating Expenses (in \$000's)	2021	2022	2023
	Actual	Forecast	Plan
Contract pilots' fees	\$ 52,743	\$ 64,669	\$ 63,785
Salaries and benefits	14,186	15,451	16,656
Pilots' transportation	10,297	10,753	9,532
Pilots' training	1,935	3,195	3,396
Depreciation	1,623	1,960	4,482
Fuel	1,602	2,849	2,680
Repairs and maintenance	1,160	1,318	1,240
Pilotage Act administration fee	730	887	969
Other expenses	2,223	2,371	2,536
Total operating expenses	\$ 86,499	\$ 103,453	\$ 105,276

Expense Analysis

Expenses in 2023 are expected to increase overall as follows, based on the cost drivers set out below:

1. Coastal contract and callback costs are expected to decrease by \$0.9 million in 2023. This decrease is primarily driven by:
 - a. a 10% decrease in volumes over 2022 from concerns of an economic recession;
 - b. a 9.5% increase in the pilotage unit fee payout rate; and
 - c. a 9.5% increase in the hourly fee payout rate.
2. Salaries and benefits are expected to increase by \$1.2 million due to wage increases in collective agreements being tied to increases in the Consumer Price Index for the preceding year, which has been forecast to be 8.5% at the end of 2022.
3. Pilot transportation costs are expected to decrease by \$1.2 million, as we were using more costly charter flights at the beginning of 2022 to ensure pilot safety and availability during the fifth wave (Omicron variant) of the pandemic. We are not expecting that need to recur in 2023.
4. Training costs are expected to increase by \$0.2 million in 2023, as we complete catching up with training postponed during the pandemic.
5. Depreciation costs are expected to increase by \$2.5 million in 2023, primarily from setting up and amortizing a right-of-use asset related to the helicopter services contract for pilot transportation that we expect to sign in 2023 to support the expanded Trans Mountain pipeline and terminal.

Capital Projects

The Authority expects that its capital program will require \$3.6 million in expenditures in 2022, primarily related to the refurbishment of three of our older launches.

The refurbishment of the launches includes work on the hulls of both the Chinook and Pathfinder, and replacing the engines of the Scout, which are at the end of their useful life. The total planned cost is \$2 million.

The remaining capital costs include upgrades to buildings and office space, communication equipment, portable pilotage units and other items totaling \$1.6 million.

The Authority intends to use existing cash reserves to fund these capital expenditures.

The Authority also expects to enter an agreement in 2023 for helicopter services for pilot transportation to/from tankers departing from the expanded TransMountain pipeline terminal in Burnaby. The agreement is likely to be accounted for as a right-of-use asset. Payments due to the helicopter service provider will be funded from operating revenues. Timing of commencement is either late 2023 or early 2024.

4. LIQUIDITY AND CASH RESERVES

This section will include commentary about the forecast liquidity and cash reserves of the Authority with the following proposed structure:

- Rationale for maintaining the forecast cash balance
- Summary of level of cash needed to operate as a going concern
- Table of prior years' actual and current year forecast cash and working capital
- Discussion of the reserve balance.

Service charges are set based on the Authority's financial requirements, which consider projected volumes and planned expenditures.

There is also a need to absorb unpredictable factors – mainly fluctuations in traffic volumes resulting from unforeseen events (i.e. snow on the railways causing significant delays in getting grain to terminals or political decisions resulting in temporary shifts in trade and shipping volumes).

As discussed in more detail in section 5, when determining the level of service charges required, the Authority considers its current and future financial requirements. Among other issues, the following are considered when establishing service charges:

- the Authority's financial requirements and the extent to which operating costs are variable;
- the expected upcoming capital costs and the extent to which borrowing is introduced; and
- the current and anticipated balance in the cash and investment account.

The Authority's current asset balances, including cash and current investments, in comparison to current liabilities are reflected below. Amounts are as of the year-end:

(in \$'000)	2020 Actual	2021 Actual	2022 Forecast	2023 Forecast
Cash	7,707	6,594	5,012	4,395
Investments	1,258	1,170	1,181	1,481
Other current assets	5,852	6,224	5,813	6,743
Current assets	14,817	13,988	12,006	12,619
Current liabilities	(13,747)	(13,291)	(12,852)	(18,140)
Net working capital	1,070	697	(846)	(5,521)
Ratio of current assets to current liabilities	1.08	1.05	0.93	0.70

The decline of \$0.4 million over the year in the forecast 2023 cash balance is a result of capital expenditure during 2023, which will be financed from existing cash balances, rather than from new debt.

The Authority intends to add \$0.6 million to its investment account in 2023, of which \$0.3 million will be current (mature within one year). The investment account is maintained to allow the Authority to withstand the unforeseen scenario where revenues, net of variable costs, are 25% less than planned. Our long-term target for the investment account balance is approximately \$5 to \$6 million.

The Authority’s long-term objective is to keep its cash balance between approximately \$5 and \$7 million and a working capital ratio of at least 1.0.

The review and determination of an appropriate corporate contingency, in which the cash and reserves are included, is undertaken annually, and considered in setting customer service charges.

5. PROPOSED REVISION TO SERVICE CHARGE RATES

This section will include commentary about the proposed pilotage charge rates by the Authority with the following proposed structure:

- Basis for determination of rate changes;
- Table of proposed rate changes; and
- Commentary on rate changes.

The Authority determines the rate changes that are required as follows:

- Determine volumes as outlined in section 2;
- Determine expenses as per volumes and contractual requirements and as outlined in section 3;
- Determine capital expenditures and financing as outlined in section 3;
- Determine reserve account and cash required as outlined in section 4; and
- Determine the rate necessary to achieve all the above.

Changes to pilotage charges, proposed to be effective January 1, 2023, are calculated for each service, as outlined in the following table:

Category	Rate Increase	New / Adjustment	Application Methodology	Effect on Customers for 2023
Pilotage rates based on hourly or unit fees	10.5%	Adjustment	All rates affected	\$6.9 million
Pilot boat fees	9.75%	Adjustment	All rates affected	\$1.1 million
Second or additional pilot fees	80% of unit fee	Adjustment	Assignments of 8 hours or less	\$0.3 million
Pilotage Act administration charge	45.2%	Adjustment	Per assignment	\$0.2 million
Other fees	8.5%	Adjustment	All rates affected	\$1.0 million
Total effect				\$9.5 million

The increase of 10.5% in the base hourly and unit fee rates, 9.75% for pilot boat fees, and 8.5% for other fees in 2023 are driven by projected increases in the Authority’s base cost structure.

The change to second pilot fees is required to align service charges for second pilots more closely with the corresponding payout under our contract with BCCP. Currently, service charges for a second or additional pilot are based on hours only, whereas the amount payable under the Authority’s contract with BCCP is based on hours plus 80% of the unit fee for each additional pilot. The Authority is proposing to begin charging not only the hours, but also 80% of the unit fee for each additional pilot for assignments which would normally be undertaken in eight hours or less, which are not tethered tankers.

Assignments over eight hours are required under the *General Pilotage Regulations (s.25.15)* to have two pilots and the Authority is not proposing any change in service charges for these assignments.

The proposed service charge for the administration of the *Pilotage Act* is based on the allocation of administration costs from Transport Canada to the Authority. This has increased for 2022/23 and, combined with a lower number of assignments forecast for 2023 over which to recover the costs, results in an unusually high increase per assignment.

The total estimated increase in fees of \$9.5 million translates to an average of approximately \$844 per assignment.

PROPOSED RATE REVISIONS

Description		Current Rates \$	Proposed Rate \$	% Change
Vessel up to 226m				
Pilotage unit fee		5.0253	5.5530	10.5%
Vessel greater than 226m				
Pilotage unit fee		4.3851	4.8455	10.5%
Gross tonnage fee		0.012804	0.014148	10.5%
Tethered tanker with DWT greater than 39 999				
Pilotage unit fee		7.5383	8.3298	10.5%
Tethered tanker greater than 226m with DWT greater than 39 999				
Pilotage unit fee		6.5779	7.2686	10.5%
Gross tonnage fee		0.01923	0.02125	10.5%
Pilotage unit fee – dead ship		10.0506	11.1059	10.5%
Other charges				
Temporary surcharge for COVID-19		400.00	400.00	No change
Time charges		252.24	278.73	10.5%
Minimum charge		1,168.01	1,290.65	10.5%
Cancellation charge		1,008.97	1,114.91	10.5%
Out-of-region charges				
Per hour		252.24	278.73	10.5%
Embark/Disembark Anacortes, Bellingham, Cherry Point or Ferndale		2,253.62	2,490.25	10.5%
Embark/Disembark other out-of-region location		3,005.21	3,320.76	10.5%
Transportation charges				
Harbour or Port		191.49	207.77	8.5%
Fraser River		184.32	199.99	8.5%
Northern		1,899.37	2,060.82	8.5%
Prince Rupert		600.83	651.90	8.5%
Southern		600.83	651.90	8.5%
Area where pilot has begun travel and is cancelled		191.49	207.77	8.5%
Pine Island		6,004.55	6,514.94	8.5%
Pilot boat charges				
Brotchie Ledge		484.12	531.32	9.75%
Sand Heads		1,937.73	2,126.66	9.75%
Triple Island		2,513.94	2,759.05	9.75%
Cape Beale		7,576.67	8,315.40	9.75%

Description		Current Rates \$	Proposed Rate \$	% Change
Pine Island		4,662.91	5,117.54	9.75%
Entrance to Nanaimo Harbour		975.71	1,070.84	9.75%
Prince Rupert Anchorages 8 – 9		677.03	743.04	9.75%
Prince Rupert Anchorages 10 - 31		1,147.45	1,259.33	9.75%
Pilot boat capital charge		106.40	116.77	9.75%
Other charges				
Delay charge		252.24	278.73	10.5%
Short order charges				
• Order initiated less than 10 hours and between 06:00 and 17:59		1,008.97	1,114.91	10.5%
• Order initiated less than 10 hours and between 18:00 and 05:59		2,017.94	2,229.82	10.5%
Restricted ship charge		1,896.61	2,095.75	10.5%
Remote port charge		6,082.94	6,721.65	10.5%
Technology charge		53.20	57.72	8.5%
Pilotage Act administration charge		59.17	85.90	45.2%

Proposed changes in these rates would be effective January 1, 2023.

6. JUSTIFICATION OF THE PROPOSAL IN RELATION TO THE CHARGING PRINCIPLES AND COST-EFFECTIVENESS ASSESSMENT

The Authority shall observe the following charging principles when establishing or revising pilotage charges:

- a) that pilotage charges be established and revised in accordance with an explicit methodology — that includes any conditions affecting the pilotage charges — that the Authority has established and published;
- b) that pilotage charges be structured in a way that does not encourage a user to engage in practices that diminish safety for the purpose of avoiding a charge;
- c) that pilotage charges be the same for Canadian users or ships and foreign users or ships;
- d) that pilotage charges be set at levels that allow the Authority to be financially self-sufficient and be fair and reasonable; and
- e) that pilotage charges not be set at levels that, based on reasonable and prudent projections, would generate revenues exceeding the Authority's current and future financial requirements related to the provision of compulsory pilotage services.

The principles governing the establishment of new charges or the revision of existing charges by the Authority are set out in section 33.2 of the *Pilotage Act*. Each of the principles is presented below in italics, followed by an explanation of how the Notice complies with that principle.

33.2 (1) a. Pilotage charges shall be established and revised in accordance with an explicit methodology – that includes and conditions effecting the pilotage charges – that the Authority has established and published;

The Notice, required under section 33.3 of the *Pilotage Act*, has been published on the Authority's website. In addition, the Authority has sent a copy of the Notice to all known and affected industry associations. Based on this information, any person subject to the Authority's charges can calculate the amount that would be payable for a given pilotage assignment.

33.2 (1) b. that pilotage charges be structured in a way that does not encourage the user to engage in practices that diminish safety for the purpose of avoiding a charge;

For any given assignment, the Authority's charges are not structured in such a manner that safety may be affected. Given the fact that pilotage services are mandatory for any commercial vessel of 350 gross tons or larger, while travelling in Canadian pilotage waters, users have no option but to use the services of a pilot. In addition, the structure of the Authority's charges is such that the greatest proportion of a charge is not related to time or routing, but instead on the unalterable dimensions of the vessel which do not change between one journey or the next.

33.2 (1) c. that pilotage charges be the same for Canadian users or ships and foreign users or ships;

There is no differentiation in the proposed charges for an assignment whether the vessel is domestic or foreign.

33.2 (1) d. that pilotage charges be set at levels that allow the Authority to be financially self-sufficient and be fair and reasonable;

The proposed charges are based on an allocation of operating and capital costs, that allow the Authority to fulfill its mandate and achieve financial self-sufficiency. The increases are fair and reasonable considering the increasing costs of business.

33.2 (1) e. that pilotage charges not be set at levels that, based on reasonable and prudent projections, would generate revenues exceeding the Authority's current and future financial requirements related to the provision of compulsory pilotage services;

The Authority's charges are set to recover the Corporation's expenses net of other revenues determined in accordance with International Financial Reporting Standards ("**IFRS**") and the costs of complying with certain financial requirements, as described in detail in subsection 33.2 of the *Pilotage Act*.

7. DETERMINATION OF CHARGES

The Authority's aim when determining charges is to strive for area-by-area and port-by-port financial self-sufficiency over the longer-term. Rates are set on a port-by-port basis to achieve this aim. This is an effort to minimize cross-subsidization between stakeholders.

Charges are applied to a pilotage assignment-based size and time and type of move. The definitions are below:

Areas means the compulsory pilotage areas described in section 3 of the [Pacific Pilotage Regulations](#); (*zone*)

assignment means the assignment of a pilot to take the conduct of a ship in the Areas; (*affectation*)

Authority means the Pacific Pilotage Authority; (*Administration*)

breadth of the ship means the maximum distance, in metres and centimetres, to the outside of the shell plating of the ship; (*largeur du navire*)

dead ship means a ship normally self-propelled that is without the use of its propelling power; (*navire mort*)

draught means the greatest depth of the submerged part of a ship, in metres and centimetres, at the time pilotage services are performed; (*tirant d'eau*)

harbour means a place set out in Part 1 of Schedule 1 of the Customer Guide to Charges, published on the Authority's website; (*havre*)

harbour or port assignment means an assignment which occurs wholly within a harbour or port at which pilots are based; (*affectation dans un havre ou port*)

northern assignment means an assignment in the area north of Seymour Narrows or on the West Coast of Vancouver Island, excluding Barkley Sound and Alberni Inlet, during the course of which a ship enters or departs a harbour or port in that area or transits that area; (*affectation nord*)

overall length means the total distance, in metres and centimetres, from the foremost to the aftermost point of the hull of the ship; (*longueur hors tout*)

pilotage unit means, the result obtained by multiplying the overall length of the ship, by the breadth and the draught of the ship at the time of the assignment and by dividing the product by 100; (*unité de pilotage*)

pilot boat means a boat employed in the service of the Authority; (*bateau-pilote*)

port means a place set out in Part 2 of Schedule 1 of the Customer Guide to Charges, published on the Authority's website; (*port*)

Prince Rupert assignment means an assignment other than a harbour or port assignment that occurs within the area between the Triple Island boarding station and the port of Prince Rupert or the harbours of Porpoise Harbour or Port Simpson; (*affectation Prince Rupert*)

Region means the Region of the Authority as defined in the schedule to the [Pilotage Act](#); (*région*)

restricted ship means a ship that is unable to operate at full manoeuvring revolutions per minute or a ship that, because of maintenance on its engines while it was in port, requires more than one hour to work up to full manoeuvring revolutions per minute; (*navire à capacité limitée*)

southern assignment means an assignment other than a harbour or port assignment within Barkley Sound and Alberni Inlet and the area south of Seymour Narrows during the course of which a ship enters or departs a harbour or port in that area or transits that area. (*affectation sud*)

Calculations

Note that any references to “schedules” below refer to the schedules found in the Authority’s Customer Guide to Charges, published on its website.

Compulsory Pilotage Areas — One-way trip for a vessel less than 226m

The charge for a ship, other than a dead ship for a one-way trip in a compulsory pilotage area is calculated as follows:

where

PU: The pilotage unit (LOA x breadth x deepest draft)/100

UC: The unit charge set out in schedule 2 column 3

TC: The time charge set out in schedule 3 item 1 column 2

ETC: The excess time charge set out in schedule 3 item 2 column 2

PB: A fee for the pilot boat set out in schedule 7 column 2

FL: Fuel charge set out in schedule 8

PBRC: Pilot Boat Replacement Charge set out in schedule 7 column 3

EX: Pilot expense set out in schedule 6

T: Technology Charge B. Schedule of Charges item o number 20

PAAF: Pilotage Act Administration Fee

TS: Temporary Additional Charge B. Schedule of Charges item d number 7

$$(PU \times UC) + TC + PB + FL + PBRC + EX + T + PAAF + TS$$

If a vessel trip is, or is deemed* to be, 8 hours or less with a second pilot, then:

$$(PU \times UC) \times 1.8 + TC + TC + PB + FL + PBRC + EX + EX + T + PAAF + TS$$

**includes trips that are over 8 hours that could be achieved under normal sea speed in 8 hours or less*

If vessel goes over 8 hours with second pilot:

$$(PU \times UC) + TC + TC + PB + FL + PBRC + EX + EX + T + PAAF + TS$$

If vessel goes over 8 hours without a second pilot:

(PU x UC) + TC + ETC + PB + FL + PBRC + EX + T + PAAF + TS

Compulsory Pilotage Areas — One-way trip for a vessel 226m or more

where

- PU:** The pilotage unit (LOA x breadth x deepest draft)/100
UC: The unit charge from B. Schedule of Charges section 2.C.6.2(a)
GT: The gross tonnage of the ship
GTF: Gross tonnage fee from B. Schedule of Charges section 2.C.6.2(b)
TC: Time charge set out in schedule 3 item 1 column 2
ETC: Excess time charge set out in schedule 3 item 2 column 2
PB: A fee for the pilot boat set out in schedule 7 column 2
FL: Fuel charge set out in schedule 8
PBRC: Pilot Boat Replacement Charge set out in schedule 7 column 3
EX: Pilot expense set out in schedule 6
T: Technology Charge B. Schedule of Charges item o number 20
PAAF: Pilotage Act Administration Fee
TS: Temporary Additional Charge B. Schedule of Charges item d number 7

$$(PU \times UC) + (GT \times GTF) + TC + PB + FL + PBRC + EX + T + PAAF + TS$$

If a vessel trip is, or is deemed* to be, 8 hours or less with a second pilot, then:

$$[(PU \times UC) + (GT \times GTF)] \times 1.8 + TC + TC + PB + FL + PBRC + EX + EX + T + PAAF + TS$$

**includes trips that are over 8 hours that could be achieved under normal sea speed in 8 hours or less*

If vessel goes over 8 hours with second pilot:

$$(PU \times UC) + (GT \times GTF) + TC + TC + PB + FL + PBRC + EX + EX + T + PAAF + TS$$

If vessel goes over 8 hours without a second pilot:

$$(PU \times UC) + (GT \times GTF) + TC + ETC + PB + FL + PBRC + EX + T + PAAF + TS$$

Compulsory Pilotage Areas — One-way trip for a dead ship

The charge for a dead ship for a one-way trip in a compulsory pilotage area is calculated as follows:

where

- PU:** The pilotage unit (LOA x breadth x deepest draft)/100
DS: Another pilotage unit (PU + UC) set out in schedule 2 item 2 column 3
UC: The unit charge set out in schedule 2 item 1 column 3
TC: Time charge set out in schedule 3 item 1 column 2
ETC: Excess time charge set out in schedule 3 item 2 column 2
PB: A fee for the pilot boat set out in schedule 7 column 2
FL: Fuel charge set out in schedule 8

PBRC: Pilot Boat Replacement Charge set out in schedule 7 column 3

EX: Pilot expense set out in schedule 6

T: Technology Charge B. Schedule of Charges item o number 20

PAAF: Pilotage Act Administration Fee

TS: Temporary Additional Charge B. Schedule of Charges item d number 7

(PU x UC) + DS +TC + PB + FL + PBRC + EX + T + PAAF + TS

8. COST OF SERVICES

The Authority records costs for pilotage services provided and does so in accordance with IFRS. There are currently two service delivery centres that are within the Authority's regional jurisdiction. The Fraser River Pilots (employee pilots) cover area 1 and the BC Coast Pilots cover areas 2-5 and are licensed for the entire area. Pilot boat services and facilities are localized, and other costs are generated by specific pilotage assignments. Shared costs include administrative overhead, dispatch centre costs, and training costs.

a) Cost Allocation Methodology

Coastal pilotage

The coastal pilotage costs are variable in that the expenses are dependent on the number of assignments carried out in areas 2 through 5. The Authority does not pay the BC Coast pilots unless they are performing assignments. These costs, including the cost of callbacks, are all variable.

Fraser River pilotage

The Fraser River pilotage costs are a mix of fixed and variable with fixed salaries and variable costs for overtime and callbacks related to assignment volume and timing.

Launches

When determining the charges and measuring subsequent results, the direct costs for resources available to the area are applied to that individual service delivery centre based on the locations of the pilot launches and dispatch operations. These costs include:

- Pilot boat costs and crewing services;
- Local wharves and structures costs;
- Depreciation and financing costs related to the above; and
- Communications and other equipment related to the above.

Variable costs for launches are driven by activity in the specific area are also charged against the centre for which they are incurred. These costs include pilot boat fuel.

Other costs

Costs that are not attributable to any single service delivery centre or grouping are allocated proportionally to their directly attributed costs, such as the Fraser River.

b) Cost Allocation Process

Individual budgets are developed for each of the cost centres using the actual costs for the previous year as the basis and working with industry to determine the expected volumes and assignments in the following year. These costs are then adjusted for contractual changes and commitments, planned alterations to area resources, and expected changes in activity.

- Pilot fees for the coast and Fraser River are allocated in accordance with the agreements in place and the expected assignment numbers for each centre.

- Pilot boat costs and crewing expenses are local resources and are costs assigned to that cost centre.
- Local wharves, storage facilities, and pilot/crewing offices have costs that are also charged directly to the specific cost centre.
- The assets above have depreciation and financing costs related to them that are also charged directly.

The variable costs for each station, including pilot boat fuel costs and transportation costs, are budgeted based on a forecast of number of assignments. The Authority uses several sources of information to predict traffic levels. The traffic patterns of previous years are combined with input from the industry, terminals, ports and associations.

The allocated costs are determined through the development of administration, dispatch, and training budgets. These budgets are based on historical costs, contractual agreements, and training requirement triggers. These costs are then charged to service delivery centres based on resources and activity levels for each.

9. CONSULTATION

Consultations in various forms took place with the affected parties throughout 2021 and 2022. Formal consultation sessions were held either in-person or via video conference for the following stakeholders during a consultation period prior to publishing the Notice.

Chamber of Shipping BC: Monthly Association meetings, as well as Service Charge meetings on Sep 8, 27, and 28, 2022.

Shipping Federation of Canada: Monthly Association meetings, as well as Service Charge meetings Sep 8, 15, and 28, 2022.

CLIA: Monthly Association meetings, as well as Service Charge meetings on Sep 8 and 27, 2022.

The Authority's financial results are also openly shared at every monthly meeting with industry associations.

Alternatives to service charge increases were presented, where applicable, and feedback from participants was encouraged. For various ports and districts, the alternative to increased service charge rates would be a reduction in pilot numbers or availability. Decreases in traffic may occur from year to year and are not expected to be long-term. This makes it impractical to reduce pilot numbers without having severe impacts on service levels to industry when a recovery begins. Stakeholders have consistently indicated that their primary concerns are with service levels and have requested that the number of pilots be increased in some areas, and maintained in others, so that pilot availability is not compromised. The proposed amendments would address these concerns.

10. INFORMATION REGARDING THE NOTICE AND ON MAKING REPRESENTATIONS TO THE PACIFIC PILOTAGE AUTHORITY

The Notice is available online and a copy may be downloaded from the Authority's website at <https://www.ppa.gc.ca/>. Information on the existing charges is also provided in the Authority's website.

Additional copies of the Notice can be obtained through request at the following address:

In writing: *Chief Executive Officer
Pacific Pilotage Authority
1000-1130 West Pender Street
Vancouver, BC
V6E 4A4*

By email: oberkev@ppa.gc.ca

By facsimile: (604) 666-1647

By telephone (604) 666-6771

Pursuant to section 33.3 of the Pilotage Act, any person may make representations about the proposal to the Authority, in writing, on or before the date set out in the Notice. Any person making written representations is to include a summary of those representations. The summary may be made public by the Authority. In addition, any person making written representations by the date set out in the Notice will have an opportunity to file a notice of objection related to the proposal with the Canadian Transportation Agency.

Pursuant to section 33.3 of the Pilotage Act, persons interested in making representations in writing to the Authority regarding the Notice may do so in writing to the following address:

*PACIFIC PILOTAGE AUTHORITY
1000-1130 West Pender Street
Vancouver, BC
V6E 4A4
Attention: Chief Executive Officer*

By facsimile: (604) 666-1647

Note: Representations must be received by the Authority not later than the close of business on October 30, 2022.