

PACIFIC PILOTAGE AUTHORITY’S DETAILED ACTION PLAN
to the recommendations of the 2024 Special Examination of the Auditor General of Canada

Report Ref. No.	OAG Recommendation	Departmental/Organisation Response	Description of Final Expected Outcome/Result	Expected Final Completion Date	Key Interim Milestones (Description/Dates)	Responsible Organization/ Point of Contact (Name, Position, Tel #)	Indicator of Achievement (For Committee Use Only)
21	The corporation should document actions to be taken or the rationale for not taking any actions in relation to conflicts of interest declared by board members.	Agreed. Starting in May 2024, the corporation will document actions to be taken or the rationale for not taking actions in relation to conflicts of interest declared by board members.	Conflicts of interest for Board members and any actions to be taken are documented.	Completed Q3 2024	The Authority updated its procedures for Board member declarations in September 2024 to include documenting any mitigation measures that will be taken or the rationale for not taking further action.	Corporate Secretary	
23	The corporation should put in place a conflict-of-interest disclosure process for all employees, including a declaration of their compliance with the code of conduct, and should report on this to the Board of Directors.	Agreed. The corporation will put in place a conflict-of-interest disclosure process for all employees, including a declaration of their compliance with the code of conduct, by fall 2024. The corporation will then report on results to the board.	A conflict-of-interest disclosure process exists for all employees, including compliance with the code of conduct, and results are reported to the Board.	Completed Q4 2024	<p>All active employees have now completed the 2024 declaration of compliance with the Organizational Code of Conduct. This was reported to the Board at the June 5, 2024 meeting. Employees are required to attest to the Code of Conduct upon hiring and every three years thereafter and management is required to attest to it upon hiring and each year thereafter.</p> <p>A conflict-of-interest procedure for employees and management has been finalized and published on SharePoint. This was shared with the HR Committee on August 26, 2024. This procedure was distributed to all employees with an attestation form on November 26, 2024. Thereafter it will be distributed to management annually and employees every three years.</p>	Chief Human Resources Officer	
28	The corporation should compare its residual risks with its tolerance levels to determine whether additional mitigation measures should be put in place.	Agreed. The corporation will assess the residual risks against tolerance levels during the annual risk review process to determine whether additional mitigation measures are needed and will report results for key risks to the Board of Directors. This will be completed by the end of 2024.	Residual risks are compared to the corporation’s risk tolerance level and mitigation measures are in place when necessary.	Completed Q1 2025	A risk appetite comparison methodology has been developed and was shared with the Board of Directors in June 2024. This has been documented in our Enterprise Risk Management user manual. The risk register has been adjusted and the comparison between residual risks and tolerance levels and the review of any required additional mitigation measures was incorporated into a risk review with risk owners in November 2024. Risk appetite statements and comparison to the risk rating for key risks was shared with FAC in February 2025.	Chief Human Resources Officer	

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29	The corporation should update its emergency plan and associated procedures for the new pilot dispatching system and should test the plan.	Agreed. The corporation will update the emergency plan and associated procedures by the end of 2024 for the new pilot dispatching system. Once completed, the corporation will conduct a drill within 6 months to test its emergency preparedness.	An updated and recently tested emergency plan, which reflects procedures for the new pilot dispatching system.	Completed Q2 2025	We completed a tabletop exercise with KPMG in November 2024 to test our recovery procedures if our dispatching system is the subject of a cyber incident. We have also updated our emergency plan and conducted a tabletop exercise focused on dispatch procedures to test the plan on May 10, 2025.	Chief Financial Officer	
30	The corporation should ensure that risk mitigation measures are implemented as intended, take the necessary actions should such measures not be in place, and report on progress to the Board of Directors.	Agreed. By the end of 2024, the corporation will add a control effectiveness rating to its risk register. The effectiveness of risk mitigation measures will be assessed during the corporation's ongoing risk review process. The effectiveness of mitigation measures for key risks will be reported to the Board of Directors.	Risk mitigation measures are reviewed annually for effectiveness and reported to the Board.	Completed Q4 2024	A control effectiveness rating has been established and added to the risk register. A review of the effectiveness of risk mitigation measures has been incorporated into the risk review process. The rating system was reviewed at the Board of Directors' meeting in June 2024 and was incorporated into the risk review with risk owners in November 2024. Control effectiveness ratings for all key risks were reported to the Board in December 2024.	Chief Human Resources Officer	
43	The corporation should conduct regular performance assessments of its launch crew employees.	Agreed. By the end of 2024, the corporation will formalize regular performance assessments of its launch crew employees.	Regular performance assessments of launch crew employees are conducted.	Completed Q4 2024	A performance assessment form was developed, communicated to the crews and the Union, and published on SharePoint in August 2024. Each launch crew member will be evaluated twice every five years by operational leadership to allow for flexibility. Performance evaluations commenced in September 2024.	Chief Technical Officer	

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45	The corporation should ensure that all pilots take the required training, and it should conduct ongoing monitoring to ensure that pilots meet all requirements of its quality assurance programs.	Agreed. By the end of 2024, the corporation will ensure that all pilots take the required training, and it will implement a protocol to regularly monitor training records to ensure that pilot training is delivered within required timelines.	Pilot training is monitored regularly and completed within required timelines.	Outstanding refresher training was completed Q2 2024. Checking training status was completed Q4 2024.	All outstanding refresher training (Azipod and Tethered tug) identified during the Special Exam was provided to pilots by Q2 2024. Members of our Pilot Training and Evaluation Committee are reviewing training status at each quarterly meeting going forward.	Chief Operating Officer	
48	The corporation should ensure that its established safety measures related to the annual board-mandated recovery drill and inspections of safety equipment and of pilot launches are followed.	Agreed. For the annual board-mandated recovery drill scheduled in May 2024, the corporation will ensure that all launch crew members participate and, if not, that they perform such a drill at a later date as required. For inspections, starting in April 2024, the corporation will either follow or amend documented procedures to reflect current practices.	All launch crew complete recovery drills annually, or at the earliest available opportunity, and safety equipment on launches is inspected annually.	Completed Q3 2024	A form was developed and has been completed by launch crew members who missed the mandatory annual drill. All missing drills were then completed with accompanying paperwork by the end of September 2024, except for one crew member. This crew member is a casual master and has not completed any work shifts since the new procedure was introduced due to summer availability. He will complete a drill on his first available shift. Wording in the <i>Launch Crew Standing Orders</i> has been amended to allow masters to delegate safety inspections to other crew members, while maintaining overall responsibility of these inspections. Inspections of safety equipment are being conducted monthly for all launches.	Chief Technical Officer	

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51	The corporation should ensure that the navigation condition of the <i>General Pilotage Regulations</i> is met when granting waivers.	Agreed. Since January 2024, the corporation is ensuring that the navigation condition of the <i>General Pilotage Regulations</i> is met when granting waivers. The corporation will work with Transport Canada Marine Safety and Security to review the assessment of navigation experience and sea time applicable to waiver applications. The corporation will also work to support Transport Canada's work in modernizing the <i>Pilotage Act</i> regulations to reflect advances in technology and training and to better incorporate current safety considerations and contemporary operations in the maritime industry.	The corporation ensures that the navigation requirements of the <i>General Pilotage Regulations</i> are met when granting waivers.	Completed Q4 2024	<p>The Authority requires proof of all regulatory requirements prior to issuing a waiver to vessels subject to pilotage.</p> <p>Transport Canada has updated the sea time requirements for a pilotage waiver through an interim order (IO) released on November 4, 2024. The Authority has updated all pilotage waiver forms to reflect the changes stated in the IO.</p> <p>The Authority held a pilotage waiver information session for the industry stakeholders on 26 November 2024.</p>	Chief Operating Officer	
52	The corporation should perform ongoing monitoring of ships that operate under a pilotage waiver to ensure that they continue to comply with the waiver conditions.	Agreed. By the end of 2024, the corporation will implement sample-based audits of vessels operating under pilotage waivers to monitor ongoing compliance with waiver conditions.	The corporation performs ongoing monitoring of ships that operate under a pilotage waiver to ensure continuing compliance with waiver conditions.	Completed Q1 2024	<p>The Authority commenced a monthly, sample-based auditing program in March 2024 for vessels operating under a pilotage waiver.</p> <p>Each month, vessels operating in the region are randomly chosen and their waiver compliance is verified. The outcomes of the random checks are documented/recorded.</p>	Chief Operating Officer	