



14 June, 2024

Ms. Shari Grady
Senior Manager, Trade Relations & Compliance
St. Lawrence Seaway Management Corporation
sgrady@seaway.ca

Feedback on Seaway survey questionnaire

Dear Ms. Grady,

The purpose of this letter is to provide feedback on the recent industry survey conducted by *the St. Lawrence Seaway Management Corporation* (SLSMC). While a significant number of our members have already shared their insights through the survey, we believe that additional perspectives are crucial to fully address success measures for an enhanced extension of the Seaway season.

Below are the key highlights gathered from discussions with our members regarding the Seaway Survey Questionnaire:

Preferences for Seaway Opening/Closing Dates:

Beginning of the Navigation Season – (March)

On the operational front, as the weather conditions by March generally improve, an earlier opening would be advantageous, by providing to the shipping industry more time and potentially leading to increased earnings. However, it's crucial to consider that some inbound cargo is contingent upon the production schedule of the mills. Consequently, it's imperative to communicate any changes to dates or times as promptly as possible to ensure the steel mills and other shippers and cargo interests can optimize their operations accordingly.

From a commercial perspective, offering incentives such as toll rebates could be viewed favorably by the international fleet. These incentives could serve as a compelling reason for ship owners to bring their vessels during the early opening period, thereby stimulating greater interest and traffic. This proactive approach may also help alleviate some of the associated costs, such as double pilotage fees or delays.

Closing of Navigation Season – (January)

Operationally, the international fleet sets deadlines to exit the system well before the final date, incorporating buffer days to account for potential delays due to weather, labor, and pilotage issues. Despite concerns about weather conditions, there is a preference for a later closing date to

accommodate end-of-season cargo shipments., Commercially, our members believe that extending the closing date is expected to slightly increase vessel traffic toward the end of the season. A defined deadline would ensure pressure on terminals, charterers, and others to adhere to the schedule.

Fixed Dates:

From a commercial perspective, fixed dates provide predictability, which is crucial for the international sector where cargoes are often booked weeks or even months in advance. However, while fixed dates offer predictability, they must also consider the operational needs of vessels such as ice and weather conditions.

Communication and Buoy Scheduling Needs:

Although the Federation acknowledges that buoy tendering management falls under the jurisdiction of the Canadian Coast Guard, we would strongly suggest that the CCG be made aware of any potential changes to dates, and to ensure that CCG has these dates in their operational plans to ensure there are no delays with buoy placements, etc. to mitigate the impacts that lead to double pilotage and nighttime navigation restrictions.

In conclusion, the Federation aims to provide constructive input to the SLSMC regarding a potential Seaway season extension. Our recommendations aim to foster collaboration with the SLSMC effectively to achieve these objectives. We welcome any anticipate meeting with SLSMC to discuss our submission and its recommendations further.

Sincerely,



Cédric Baumelle,
Director, Marine Operations

- CC Chris Hall, President and CEO, Shipping Federation of Canada
- Karen Kancens, Vice-President, Shipping Federation of Canada
- Jean Aubry-Morin, Vice President, External Relations, SLSMC