Canada's Approach to Marine Environmental Protection

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The Canadian Marine Oil Spill Preparedness and Response System

Canadian Coast Guard

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This paper summarizes Canada's national spill regime covering the mandate, principles and challenges it faces in the Canadian context of marine oil spill preparedness and response.

CANADIAN PERSPECTIVE

Canada is the world's second largest nation with the world's longest coastline of some 242,000 km. Three different oceans border it, the Pacific in the West, the Atlantic in the East and the Arctic Ocean in the North. Central Canada borders on the Great Lakes which represent the world's largest body of fresh water on which ocean-going vessels, as well as traditional Lakers, navigate.

Canada has many diverse regions that, in terms of weather, present a unique set of challenges for those responsible for the protection of the marine environment. In the Central region south of 60° north latitude, residents experience long hard winters where waters are virtually ice-covered for most of that season. The Pacific Coast is generally temperate and snow-free for most of the year while the Atlantic Coast does receive its share of severe winter storms. The Arctic Region (north of 60° north latitude) is snow and ice covered most of the year and the area is sparsely populated.

Canada's relatively small population of approximately 30 million and its vast geography have resulted in Canadians having a strong sense of attachment to the land and water that surround them. It is not surprising that Canadians demand high standards for environmental protection. The vast geography and harsh climate make Canadians major consumers of petroleum products. In fact, Canada has one of the world's highest per capita consumption of such products.

Similar to the experience of several industrialized countries, the Exxon Valdez incident proved to be a powerful catalyst for change in Canada. Canada's domestic ability through capacity and planning is now significantly greater than that of only ten years ago. Perhaps the most sweeping change has been the Government's decision to deliver a considerable portion of this enhanced preparedness in a partnership with industry where industry provides preparedness through privately-owned and operated Response Organizations that are maintained primarily through fees. These fees are levied by Response Organizations on all oil transferred to and from ships in Canadian waters. With the growing maturity of this partnership, Canada intends it to be the basis of further improvements to Canada's ability to more effectively and efficiently protect its marine environment from ship-source oil pollution.

RESPONSE DYNAMIC

In Canada approximately 3,000 to 3,500 oil spills are reported each year. Most of these spills are very minor and require no response action.
A recent study of the probability of oil spills from tankers in Canadian waters indicated that we can expect 10 spills approaching 7 tonnes in volume each year, where a response operation will be required. Further to this, each year we may experience 4 moderate spills where the spill size would be in the range from 7 to 140 tonnes, and perhaps one large spill that is in excess of 140 tonnes. Statistical estimates show that Canada might expect a very large spill, that is a spill in excess of 10,000 tonnes, once every 7 years.

Oil tanker accidents receive the most publicity in the media. However, it is evident from international statistics and from our own experience that the majority of spills occurring in Canadian waters are from vessels bunker fuel. Another serious source of pollution in the marine environment is that which occurs from the intentional discharge of contaminated bilge water and tank washings. In fact, the United States National Academy of Science has recently reported that such illegal discharges from tankers actually exceed the amount of oil spilled in tanker accidents each year.

MANDATE

International Commitments and Domestic Legislation

Canada has been an active member of the International Maritime Organization (IMO) since its inception. We have acceded to the International Convention for the Prevention of Pollution from Ships (MARPOL 73/78) and played a lead role in the development of the International Convention on Oil Pollution Preparedness, Response and Co-operation 1990 (OPRC 90). Additionally, Canada has acceded to the International Oil Pollution Compensation Convention (IOPC), the Civil Liability Convention (CLC) and the Salvage Convention.

None of the above commitments could be made without a solid foundation in domestic legislation. In this respect, Canada has three principal pieces of marine legislation.

The first is the *Canada Shipping Act*, largely administered by the Department of Transport; it deals with issues that are related to the safety of the ship. However, since the Canadian Coast Guard moved from the Department of Transport to the Department of Fisheries and Oceans, relevant portions of the *Canada Shipping Act* that deal with environmental response have been transferred to the authority of the Minister of Fisheries and Oceans.

The second and new piece of legislation is known as the *Oceans Act*. The environmental protection requirements of the *Canada Shipping Act* are now contained within the new *Oceans Act*.

The third piece of legislation is the *Fisheries Act*. This Act specifically covers, amongst other things, the dumping of deleterious substances into the marine environment and can be used for enforcement purposes in areas which are not covered by the *Canada Shipping Act*, which most specifically relates to those substances that are defined within the MARPOL 73/78 annexes.

For legislative purposes Canada's waters may be divided into two categories: Arctic and non-Arctic waters. The Arctic and its waters (waters north of 60° north latitude) are unique, and have been a concern for Canada for many years. On June 26, 1970 Canada enacted the *Arctic Waters Pollution Prevention Act*. This Act is aimed at preventing pollution, and divides Canadian Arctic waters into 16 shipping zones, wherein some 14 classes of vessel are restricted in movement according to construction design and ice-thickness. Subsection 6(2) of the *Arctic Waters Pollution Prevention Act* also gives the Governor-in-Council (in effect the Federal Cabinet) powers to repair, or remedy any condition, or to reduce or mitigate any damage that results from a deposit of waste in Canadian Arctic waters.

Non-Arctic waters (Canadian waters south of 60° north latitude) and some specified areas not covered by the *Arctic Waters Pollution Prevention Act* are subject to the provisions of the *Canada Shipping Act*. This Act has its roots in the *United Kingdom Merchant Shipping Act* of 1894 and deals with a myriad of subjects ranging from, *inter alia*, pollution and liability to compensation for pollution.

Section 678(1) of the *Canada Shipping Act* gives the Minister of Fisheries the power to take such measures as deemed necessary to repair, remedy, minimize or prevent pollution damage from a ship.

While both the *Arctic Waters Pollution Prevention Act* and the *Canada Shipping Act* provide a broad base for responding to ship-source spills, there is other federal legislation that contains provisions which could apply to marine spills.

The *Canadian Environmental Protection Act* is very broad in its application respecting the protection of human life and health and of the environment. This Act gives the Governor-in-Council the power to adopt regulations providing for, or imposing requirements respecting the manner and conditions under which, a substance may be stored, displayed, handled, or transported.

The final component of Canada's national system of preparedness and response is the Ship-source Oil Pollution Fund; Canada's domestic compensation fund. The Ship-source Oil Pollution Fund was created through a levy on the marine shipment of oil in Canadian waters between 1972 and 1976, and resides in the Public Accounts of Canada. The Ship-source Oil Pollution Fund predates other international funds such as the International Oil Pollution Compensation Fund (IOPCF). Through accrued interest over the years, the Ship-source Oil Pollution Fund has a balance of approximately

$260M, and has an independent Administrator who reports to Parliament through the Minister of Transport. The Ship-source Oil Pollution Fund is a made-in-Canada fund with a wider mandate than the IOPCF, in that it can pay reasonable costs of any ship-source oil spill, regardless of the nature of the oil or the vessel. The Ship-source Oil Pollution Fund provides additional assurance to Canada that funds are available beyond the limits of the IOPCF. Under amendments to the *Canada Shipping Act* made in 1993, the Ship-source Oil Pollution Fund can subrogate the rights of a claimant (including the Canadian Coast Guard) against a polluter, and pursue recovery in their stead.

GUIDING PRINCIPLES

The guiding principles of the Canadian marine oil spill preparedness and response system are as follows:

- effective and responsive domestic legislation;
- potential polluters pay private sector preparedness costs;
- polluter liable for reasonable costs of response;
- partnership with industry;
- comprehensive contingency planning; and
- mutual assistance agreements with our neighbours.

In general terms, these measures fall under the headings of:

- prevention;
- preparedness; and
- response.

Prevention

Since 1991, the Canadian Coast Guard has had in place a National Aerial Surveillance Program (NASP). Pollution patrols are carried out over major commercial vessel routes to maximize the visual inspection of vessels for compliance with the Pollution Prevention Regulations. Pilots and crew are trained as Pollution Prevention Officers and certified under the *Canada Shipping Act*. Evidence is collected through various media including photographs and remote sensing data that can be used to affect the prosecution of the vessel, should it be found to be in contravention of the regulations. As these patrols are carried out at low altitudes, the visible and audible presences of pollution patrol aircraft acts as a deterrent to potential polluters. In the event of a shipping casualty or pollution incident, the pollution patrol aircraft can gather information on the location and characteristics of the oil spill and report that information back to the lead authority.

The Canadian Coast Guard NASP fixed-wing patrol aircraft have conducted on average 1094 hours of patrol flights and covered a total distance of 150,539 track miles of surveillance per year. In addition, on average in each year, 9176 vessels have been overflown and inspected, approximately 276 spills have been reported and 115 vessels have been observed in the act of discharging oil. These cases have all been referred for subsequent legal action.

The Canadian Coast Guard has been working on Pollution Prevention Planning Standards for Oil Handling Facilities that will be based on ISO 14000 standards. The aim of these standards is to limit the amount of oil that is discharged into the marine environment during the loading or unloading of oil from cargo vessels at Oil Handling Facilities.

Preparedness

Canada's National Contingency Plan lays out the overall response framework for the entire country. The Plan has 5 regional annexes, one for each of our main operating regions: Pacific, Central and Arctic, Laurentian, Maritimes, and Newfoundland. Each regional plan has a series of area contingency plans that deal with specific geographic areas within the regional boundary.

These plans are working tools rather than reference documents. All regional plans and area contingency plans must be uniform in nature and must use the same standards across the country, as our total response capability relies on the cascading of capability from one region to another in the time of crisis. The National Contingency Plan provides specific direction regarding the reporting of spills, the mobilization of resources, response to the incident, the organizational structure used to manage the response and furthermore, gives guidance on site security, health and safety and such things as how to handle media inquires.

To augment the National Contingency Plan it is necessary that, since Canadian waters border the United States, Greenland (Denmark), St. Pierre et Miquelon (France), and Russia, mutual agreements be in place with those countries for the response to a spill which crosses international boundaries. Development of such mutual agreements is seen as a priority for the Canadian Coast Guard.

Canada currently has, as the result of two years of work by the Canadian and American Coast Guards, established a Joint Marine Pollution Contingency Plan. Its objectives are: to develop appropriate measures of preparedness, and systems for the discovery and reporting of pollution incidents; to institute prompt measures to restrict the further spread of pollutants; and, to provide adequate resources to respond to pollution incidents.

Government's preparedness partnership with industry

Integrated into Canada's national preparedness planning is the significant capacity now available through a network of four privately-owned and operated Response Organizations, each with the planned ability to respond to a 10,000 tonne oil spill in an assigned Geographic Area of Response. Established in 1995, following amendments to the *Canada Shipping Act* in 1993, the combined geographic areas of response of these Response Organizations provide preparedness to all Canadian waters south of 60°

north latitude. Complimenting this preparedness is the Canadian Coast Guard's own considerable response holdings.

There are two key elements to this partnership. The first is that the *Canada Shipping Act* requires that all ships over 400 tons gross tonnage and tankers over 150 tons gross tonnage operating in Canadian waters, and designated Oil Handling Facilities that load and unload oil must have a preparedness "arrangement" with a Response Organization that has been certified by the Canadian Coast Guard. The arrangement is a contract between a ship or an Oil Handling Facility that a Response Organization will provide a response if requested by the holder of the arrangement.

The second element of this policy is that the initial investment and annual costs of maintaining this private sector preparedness be borne exclusively by industry (i.e.: potential polluters) and not by Government, as had traditionally been the case in Canada before 1993. Fees are levied by Response Organizations on each tonne of oil transported in their respective Geographic Area of Response, normally at the point of unloading, or point of loading for international bound products. Costs associated with an actual response are beyond these preparedness fees which ensure only that a 10,000 tonne response is available.

In addition to the requirements of the *Canada Shipping Act,* the Canadian Coast Guard establishes standards for Response Organization certification and for the emergency plans required by Oil Handling Facilities.

To be certified by the Canadian Coast Guard, Response Organizations must undertake, every 3 years, a rigorous certification process where it is required to meet the planning standards which were developed following extensive consultations with interested parties representing the spill response sector, petroleum and shipping industries, environmental groups, provincial governments, and the Canadian Coast Guard. These standards provide details for Response Organizations in developing their response plans to enable them to be certified and to comply with the requirements for procedures, equipment and resources as set out in both legislation and in regulation.

Oil Handling Facilities, designated by Coast Guard, that receive or discharge oil from or to vessels requiring an arrangements, are required to conform with standards which include the following:

- have a declaration on-site which states that they have an arrangement with a certified Response Organization and identifies the individual who can implement the arrangement;
- have response equipment available that can be deployed within one hour of the incident for initial containment;
- report the discharge of pollutants as specified in the Pollutant Discharge Reporting Regulations.

It is through these standards that the Canadian Coast Guard hopes to reduce the impact of spills during bunkering, or the loading or unloading of oil cargo from vessels.

Response

While Canada's response system is unique in that it is built on a partnership with the oil producing and marine transport industry, the Canadian Coast Guard remains the lead national government agency responsible for ensuring an adequate and timely response to ship-source pollution is available at all times.

Ships and Oil Handling Facilities are required by the *Canada Shipping Act*, to have an emergency response plan in addition to an arrangement with a Canadian Coast Guard-certified Response Organization.

The polluter may invoke its arrangement for response with the Response Organization. In this case, the polluter assumes the role of the On-Scene Commander and manages the Response Organization engaged to respond. The polluter, however, is not obliged to invoke their arrangement with the Response Organization, and may retain the services of another contractor, or may ask the Canadian Coast Guard to assume command of the spill.

Where the polluter has assumed the role of On-Scene Commander, the Canadian Coast Guard oversees and monitors the polluter's actions to ensure the response is appropriate under the circumstances. At any time where the Canadian Coast Guard believes the response is not appropriate, it may direct the polluter to undertake certain actions, or it may assume the role of On-Scene Commander. When the Canadian Coast Guard becomes On-Scene Commander, its practice is to engage a Response Organization. The role of the Response Organization is always that of a contractor who responds at the request of a polluter or the Canadian Coast Guard. Response Organizations never assume the role of On-Scene Commander.

The Canadian Coast Guard maintains a significant capability to supplement an industry response or to provide services unavailable in the private sector. The Canadian Coast Guard responds to all marine spills north of 60° north latitude. In areas south of 60° north latitude if the polluter is unknown, unwilling or unable to respond, the Canadian Coast Guard will manage the response. The Canadian Coast Guard will also, if necessary, provide the initial resources to ensure the protection of the environment, or supplement industry resources that are already engaged in a response.

In both cases, industry led or Coast Guard led response, the onus is on the polluter, if known, to pay for the response to the incident.

A number of techniques are available to respond to spills in a variety of environmental conditions such as: mechanical recovery, in-situ burning, dispersants, or bioremediation. Each has its advantages and limitations and most have undesirable side effects or are restricted by legislation. The preferred spill cleanup method in Canada is to employ mechanical recovery where possible and use other options in specific unique circumstances. This Canadian approach recognizes the broad limitations associated with each of the various techniques.

The Canadian Coast Guard maintains a stock of equipment that is strategically located in 63 sites across the country. Teams of trained responders are located at 13 main depots. They maintain, test, and exercise the equipment at these and other sites. The Response Organizations hold a stock of equipment at 15 depots. The partnership between government and industry provides the overall response capability.

There are many elements of an effective spill response operation. These elements include: notification, call-out procedures, securing the source, and assembling an appropriate team. An effective spill cleanup operation has many components. The five main areas are: containment, recovery, storage, disposal, and support.

Containment

The Canadian Coast Guard maintains a stock of small inshore boom for initial response, protecting environmentally sensitive areas and to contain spills in protected waters. Additionally the Coast Guard operates a number of offshore containment or sweeping systems across the country.

Recovery

The recovery operation uses skimmers of various designs and operating principles. The Canadian Coast Guard maintains 256 skimmers/skimmer systems in its inventory.

Storage

The Canadian Coast Guard uses floating temporary storage devices in sizes up to 100 tonnes, which can be used to shuttle recovered product to shore based facilities or to larger conventional barges.

Disposal

The Canadian Coast Guard maintains a variety of burners to dispose of waste product both solid and liquid. Alternatively, recovered product can be collected in contracted barges or tankers and shipped for recycling.

Support

The support or logistics component covers a wide variety of equipment necessary to support a pollution countermeasures operation. This consists of, but is not limited to: vehicles, small craft or work boats, prevention material, communications equipment, cleaning equipment, hazardous material handling equipment and buildings which are solely dedicated to housing environmental response equipment. Food lodging and transportation for the work force is also required. Environmental Response Operations commonly call upon the main Canadian Coast Guard fleet to supply larger platforms and have outfitted many of these vessels for offshore recovery operations.

Shoreline cleanup is a separate component of the response. The techniques that are used depend on many different factors including: the type of substrate, the amount of shoreline, the depth of penetration, the type of oil, access to the shore, environmental sensitivity, as well as oceanographic and meteorological conditions.

Spill response managers require current and accurate information on the state of readiness and location of all resources. The Canadian Coast Guard has implemented an Inventory Maintenance Management system capable of maintaining a complete and timely record of the strategic location of all equipment throughout the country. The system generates preventive maintenance orders with detailed task sheets and check lists at regular and planned intervals. A full history including costs, usage, transfers, modifications, and ancillary supplies is maintained on all equipment.

In-Situ Burning

One method of removing the oil from the surface of the water is in-situ burning. In-situ burning is the controlled burning of oil in location on the surface of the water. This technique has been used as a response measure in several parts of the world; however, it has not been fully accepted as a spill cleanup option mainly because of the lack of understanding of the by-products of oil burning on the water surface.

Depending on local legislation, permission must be obtained from the appropriate jurisdiction to employ this technique. Many countries are now moving to a system of pre-authorization for techniques such as in-situ burning by establishing the decision criteria.

Dispersants

Chemical dispersants can be used to break oil slicks into fine droplets that then disperse into the water column. This prevents oil from being driven by winds towards shore and promotes biodegradation at sea. There are ranges of dispersant products that have been tested and pre-approved in Canada but still require site-specific approval for operational use.

Bioremediation

Bioremediation is the method of removing oil from the environment using microbes to consume the oil. This is a long term option and is of uncertain effectiveness as many factors influence the behaviour of the bacteria that consume the oil. The technique is most often used for final cleaning of shoreline areas in warmer climates. The Canadian Coast Guard does not actively participate in this method of oil removal but does monitor the progress of the technology.

National Response

In the event of a major incident in Canada where resources and capability in any one region are insufficient, the Coast Guard has developed a regionally based National

Support Team (NST). This team, coordinated from headquarters, will arrange for both personnel and equipment from unaffected regions to be deployed to the incident in support of the Regional OSC. This team is also used to assist other government departments in times of need and to fulfil Canada's international obligations.

Research and Development

It is essential to continuously improve spill response techniques and capabilities. This is accomplished through a comprehensive government and industry-funded research and development program. To ensure initiatives are not duplicated, the Canadian Coast Guard works closely with other departments in Canada and participates in the oil spills countermeasures technical committee. This committee is comprised of response and research groups throughout North America with the purpose of exchanging information and participating in joint projects. The benefits of this mechanism are that the Canadian Coast Guard is constantly aware of the status of new technology and concepts being examined throughout North America. The goals of the Canadian Coast Guard's Environmental Response R&D program are to:

- develop state-of-the-art pollution clean-up techniques;
- fund practical solutions to operational problems; and
- sponsor equipment trials and evaluate the development of aerial surveillance equipment.

Training and Exercise

The Canadian Coast Guard is an active participant on the International Maritime Organization's (IMO's) Oil Pollution Preparedness Response and Co-operation (OPRC) Working Group. The Coast Guard was instrumental in the creation of the IMO Model Training Program and in the development of two courses – Course 2A Supervisors/On-Scene Commanders and Train-the-Trainer – for use by the IMO. These courses have been presented to countries such as Cote d'Ivoire, Ghana, Estonia and Lithuania and have been proven to be most successful.

Canada is currently a member of a Correspondence Group, also under the OPRC Working Group, that is reviewing and updating all manuals existing and/or required for the response to oil spills. The Canadian Coast Guard is currently reviewing Section IV of the Manual on Oil Pollution and is working with countries such as Venezuela to create a new chapter on Emulsified and Sinking oils.

As major participants in both domestic and international exercises, the Canadian Coast Guard has developed a National Marine Spill Response Exercise Program. Exercises simulate the response to potential realistic spills. Intended for the use of all members of the spill response community, this community-based program provides principles, guidelines and the necessary tools to ensure cost effective and realistic exercises are used to test contingency plans and the overall state of response readiness. Such an approach recognizes that the response to an actual pollution incident will be a community effort, that is, it will involve both public and private sector resources.

CHALLENGES

The challenge to the Canadian Coast Guard in the near future is to divert a higher proportion of its finite financial and human resources to managing Canada's national system of preparedness and response, rather than its current situation where it both manages the system, but also responds to incidents.

The Canadian Coast Guard's focus is now directed to working closely with industry to review its capacity vis-à-vis that of industry's to determine an optimum mix of private and public resources that will allow the private sector to take on an increasingly larger share of the operational role currently carried out by the Canadian Coast Guard.

However, in addition to this review of both industry and government capacity, the Canadian Coast Guard must be confident that the private sector regime has both the stability, and flexibility it needs to allow it to grow and remain a long-term, reliable provider of preparedness and response capacity.

Operationally, the regime has been a success. Canada's national preparedness has been significantly enhanced. With its growing maturity, and increasing acceptance among industry, this private sector regime is now responding to an increasing number of oil incidents.

However, with respect to the regime's ability during its first three years to self-manage its affairs, the track record is less successful. Consequently, government has moved decisively to address governance weaknesses within the regime that if left unattended could well adversely impact the ability of the regime to reach its full potential.

These deficiencies became apparent during a dispute between Response Organizations proposing preparedness fees for the first time in 1995, and potential polluters who were required to pay these fees in order to procure the preparedness arrangement they were required by the *Canada Shipping Act* to have with a Response Organization.

In December of 1998, the Canadian Coast Guard released a discussion paper which proposed a governance structure that would provide a transparent and accountable process for proposing fees, that set-out the roles and responsibilities of all regime members, and introduced heightened public and government accountability.

Most importantly, the governance proposals maintained the self-managed character of the regime that was a key principle to industry in their agreement to put the regime in place, and to assume its full costs.

The three elements of this new governance structure are:

Regional Advisory Councils: Already a requirement of the *Canada Shipping Act*, and reporting to the Minister of Fisheries and Oceans (the Minister responsible for the Canadian Coast Guard), or Parliament, if they so choose. Enhancements are proposed to ensure that a majority of members on each of these seven-person Councils are

drawn from the communities and interests that could be potentially affected by an oil spill, and not from potential polluters. Established by the Canadian Coast Guard Commissioner, six Regional Advisory Councils currently represent each of Canada's maritime regions with a mandate to comment upon, but not direct preparedness in that region.

User Committees: Composed of those users compelled by the *Canada Shipping Act* to maintain an arrangement, these Committees will be a feature of each Response Organization. This proposal builds on industry agreements where it was recognized that a mechanism was needed to review, but not approve, the fees proposed by Response Organizations, and that the process be supported with appropriate transparency and accountability measures. It is intended that this proposed mechanism would review fees in advance of their presentation to the Minister for approval. Clients still retain the right to formally object to any fee once submitted to the Minister for approval.

National Advisory Council: With a principle mandate to ensure that Canada is adequately prepared to respond to a major spill, the National Advisory Council will be an effective means to achieve a higher degree of integration among key components of Canada's national system of preparedness and response. Establishment of the National Advisory Council also responds to stakeholder comments to the governance discussion paper supporting a clear and strong leadership role for the Canadian Coast Guard in matters relating to oil spill preparedness and response. Chaired by the Canadian Coast Guard, it will draw its membership from other Canadian federal government departments, including Natural Resources Canada, Transport Canada, and Environment Canada, the president of each Regional Advisory Council, the president of each User Committee, a representative of the four Response Organizations, and if they choose to participate, the Administrator of the Ship-source Oil Pollution Fund.

CONCLUSION

As envisaged during its development, the regime continues to offer an excellent foundation upon which to build an increasingly more effective, efficient and integrated national system of preparedness and response. In addition, with the adoption of these governance measures, regime stability will be further strengthened, allowing the regime to reach its full potential as the cornerstone of Canada's national system of preparedness and response.

Canada's goals in integrating a private sector regime into its national system of preparedness and response was intended to provide a greater degree of protection to its marine environment, and to have the costs of supporting the regime attributed appropriately to those presenting the risks: potential polluters. Both goals have been achieved. The partnership is working. The regime is stable and enjoys a high degree of industry support. The regime has been tailored to meet Canada's unique and diverse needs.

However, the job of building our national system is never finished. The Canadian Coast Guard continues to work with Response Organizations, Regional Advisory Councils, and

other stakeholders to ensure that the regime continues to improve and to adapt to the ever-changing circumstances brought about by a number of factors including new technology, and offshore developments. We are confident that our partners and we are up to the challenge.