

Boundary Bay Conservation Committee
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Not necessary to build a \$3.5 billion Container Terminal 2 (RBT2) in the Fraser River estuary

The Boundary Bay Conservation Committee (BBCC) respectfully submits this letter outlining a win-win option for Canada's west coast container business. Complete and correct information reveals that growth in Canada's west coast container business can be accommodated without spending tax dollars on infrastructure to destroy globally-significant habitat for endangered salmon, endangered Southern Resident Killer Whales, and declining populations of migrating Western sandpipers of the Pacific Flyway.



Susan Jones

Director: BBCC

The Boundary Bay Conservation Committee (BBCC) was established in 1988 to enhance public awareness of the Fraser River delta and estuary. We have worked with other conservation groups to obtain protection and recognition for this world class ecosystem

It's Not necessary to build a \$3.5 billion Container Terminal 2 (RBT2) in the Fraser estuary

It is not necessary to dredge and fill the Fraser River estuary for a man-made island the size of 250 football fields¹ for a new container terminal that will permanently disrupt the Fraser River ecosystem destroying globally-significant habitat for millions of migratory birds and endangered salmon, as well as endangered Southern Resident Killer Whales (SRKW).

It is not necessary to congest and pollute Vancouver, and the lower mainland of B.C., for the Roberts Bank Terminal 2 Project (RBT2) that will cause job losses at existing container terminals and squeeze out Vancouver's export businesses that rely on bulk shipping, not containers, to get Canada's exports to markets.

The Roberts Bank Terminal 2 Project (RBT2) is not in the public interest as it is of questionable value to Canada's economy and devastating to Canada's globally-significant Fraser River estuary. A highly flawed environmental assessment has been underway since 2013. Statistical evidence shows that Canada's west coast container business can grow for decades without RBT2.

The following topics outline the lack of correct and complete information in the Roberts Bank Environmental Assessment Statement (RBT2 EIS) and provide documented statistics and information proving that Canada's west coast container business demand can be met without RBT2.

1. The RBT2 environmental assessment fails to disclose faster growth at Prince Rupert
2. The Port of Vancouver's lowest container business forecasts are not being realized
3. The Port of Vancouver has enough container business capacity without RBT2
4. Canada's west coast container business capacity demands can be met without RBT2
5. Only 10% of Vancouver's import laden containers are for the Lower Mainland
6. Growth in the container business is import containers from Asia bound for the U.S.
7. RBT2 EIS fails to provide data or sufficient information to support a business case for RBT2
8. RBT2 EIS fails to disclose that Vancouver container exports have been flat since 2011
9. The Port of Vancouver is sending out misinformation
10. It is not true that Vancouver-bound containers will have to be re-routed through US Ports
11. Review Panel refused to consider container business capacity at the Port of Prince Rupert
12. Change in scope after 5 years negates public input, and censors important information
13. Review Panel process banned consideration of Report by transportation experts
14. There is no oversight on Port's claims
15. Insufficient information on economic impacts & concerns of significant job losses with RBT2
16. Port of Vancouver wants taxpayers to fund RBT2 and squeeze out the Port's own tenants
17. Cost to Taxpayers is \$3.5 billion and counting

1. RBT2 EIS, Table 4-1, Volume 1, Section 1, [Document # 181](#), Scrolled page 54/206

1. The RBT2 environmental assessment fails to disclose faster growth at Prince Rupert

The west coast container business is expanding more rapidly at the Port of Prince Rupert than at the Port of Vancouver. Prince Rupert container business has grown at a Compound Annual Growth Rate (CAGR) of 8% over the past 5 years compared to a CAGR of 2.6% at the Port of Vancouver. The Port of Prince Rupert is one sailing day closer to Asian markets; is less congested than Vancouver; and has a shorter rail time to eastern centres due to less rail congestion.

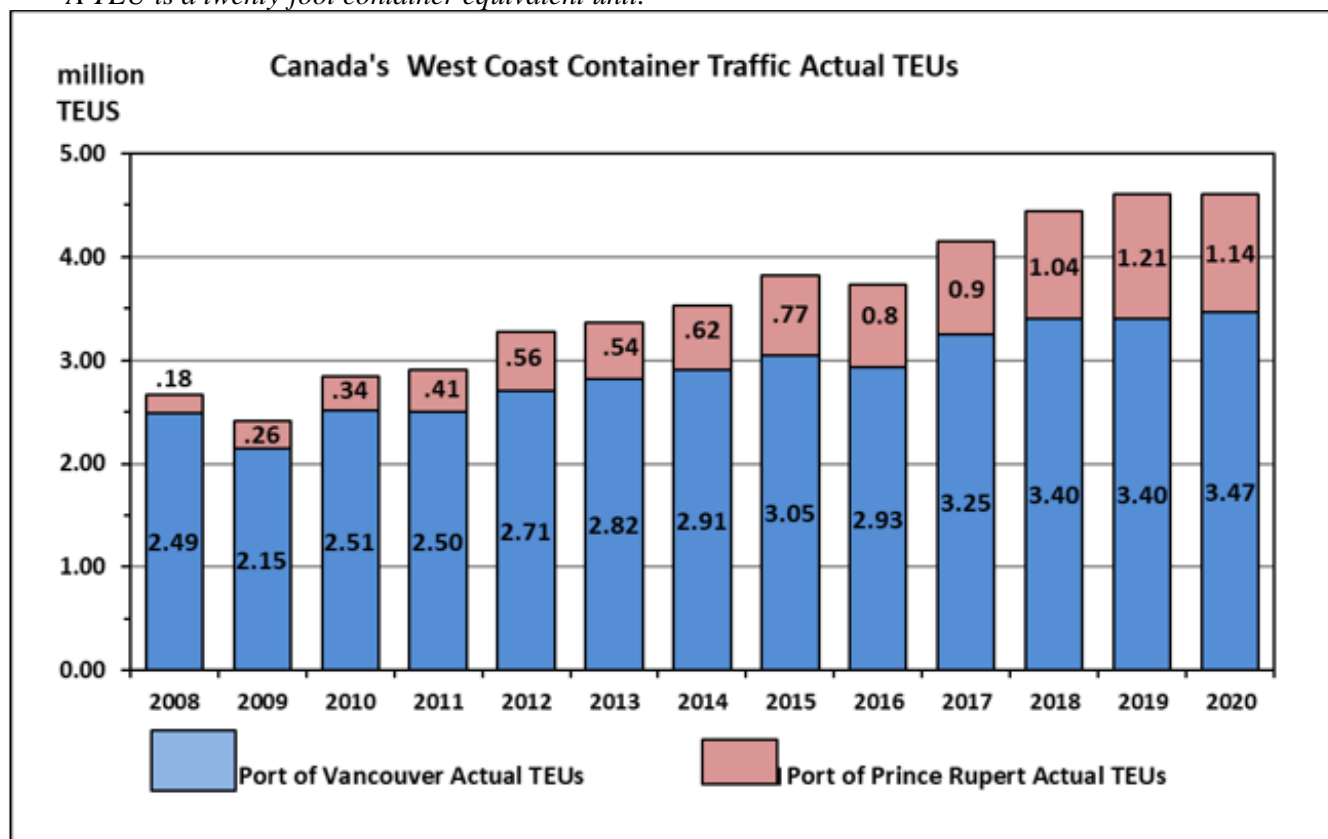
2. The Port of Vancouver's lowest container business forecasts are not being realized

Even the lowest container business forecasts by the Port of Vancouver are not being realized. Over the 8 years of environmental assessment, the Port of Vancouver has downgraded their forecasts several times while the Port of Prince Rupert has scrambled to build capacity to meet demand.

In 2006, the Port of Vancouver's lowest forecast for 2020 was 4.7 million TEUs. The actual for 2020 was 3.47 million TEUs (2019 was 3.40). So, the lowest forecast for 2020 was out by 1.2 million TEUs. That is half of the 2.4 million TEUs the Port claims it needs with RBT2.

The following graph shows the faster growth rate at the Port of Prince Rupert. Statistics are from the ports' websites. (Referenced at the end of the document) ⁱ

A TEU is a twenty-foot container equivalent unit.

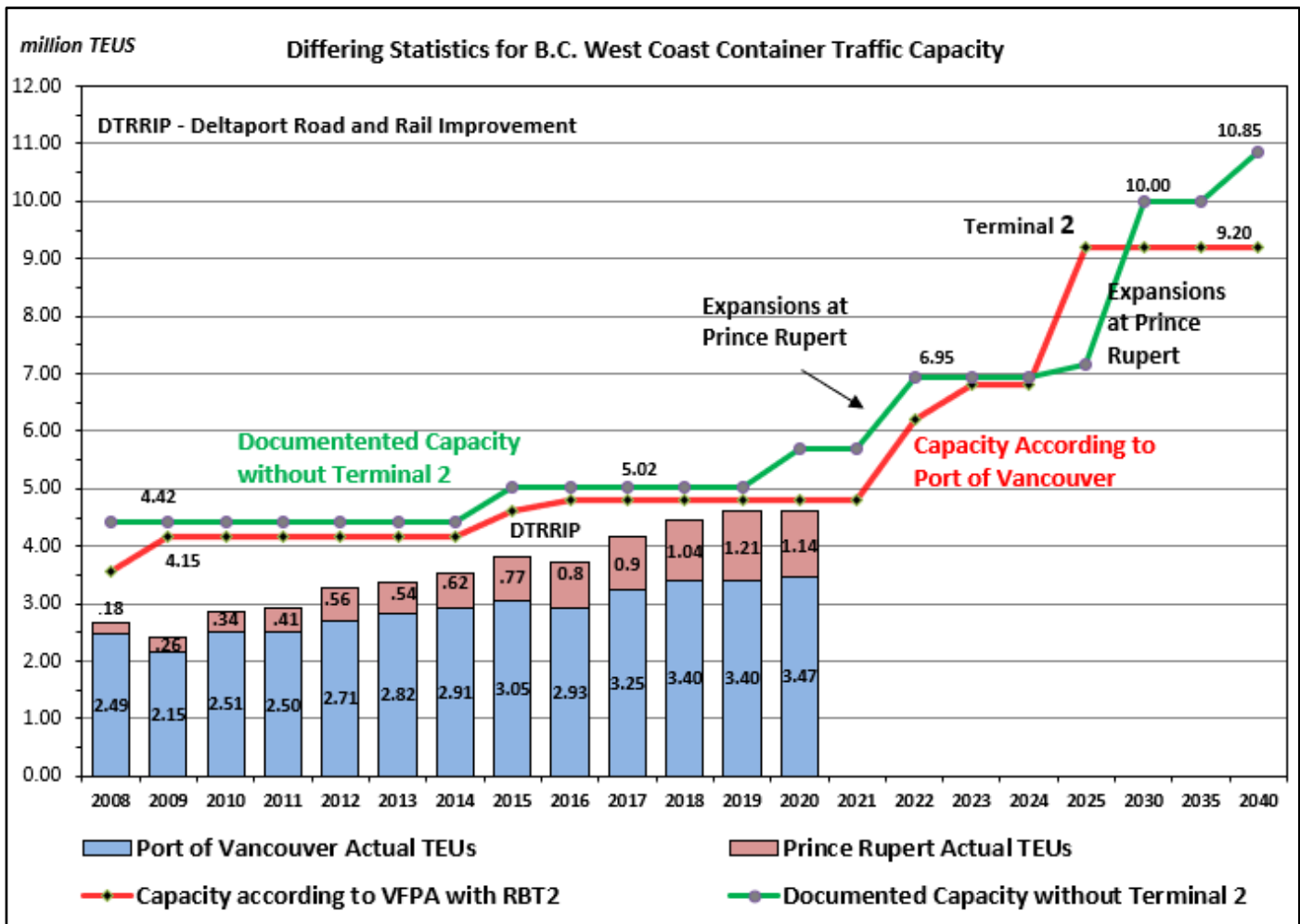


3. The Port of Vancouver has enough container business capacity without RBT2

As expansions are planned and underway at Vanterm and Centerm container terminals; and as upgrades are continuing at Deltaport, there will be sufficient capacity for the Vancouver area container business for the next two decades. Vancouver container capacity can reach 5.85 million TEUs without RBT2. At the current Compound Annual Growth Rate (CAGR) of 2.6%, it will take the Port of Vancouver 20 years to reach that capacity. At that point, if it is ever reached, it is doubtful if the congested Vancouver area could handle any more containers.

4. Canada’s west coast container business capacity demands can be met without RBT2

The following graph compares the Port of Vancouver’s statistics with published information on expansion projects planned to meet Canada’s west coast container capacity demand. It shows that ongoing and planned expansions can meet future capacity demand without dredging and filling the Fraser River Estuary for a massive, man-made island. The Roberts Bank Terminal 2 Project (RBT2) is a huge Project - costly not only in dollars (\$3.5 billion) but also in irreparable environmental damage to the Fraser River estuary. The Table for this graph is on the next page.



References:²

Documented Information on Canada’s West Coast Container Capacity Without RBT2

TEUs in millions

TEU is a twenty-foot container equivalent unit

Year	2010 Capacity	2015 Capacity	2020 Capacity	2022 Capacity	2025 Capacity	2030 Capacity	2040 Capacity
Added Capacity	Third Berth added 600,000 TEUs	Phase One DTRRIP added 200,000 TEUs	DTRRIP added 200,000 TEUs Centerm increased efficiencies	DTRRIP Added 200,000 TEUs Centerm Expansion	Deltaport increased efficiencies	Deltaport increased efficiencies	
	TEUs	TEUs	TEUs	TEUs	TEUs	TEUs	TEUs
Port							
Deltaport	2.10	2.30	2.50	2.70	2.70	3.00	3.20
Vanterm	0.84	0.84	0.84	1.05	1.05	1.05	1.05
Centerm	0.88	0.88	0.90	1.50	1.50	1.50	1.50
FSD	0.10	0.10	0.10	0.10	0.10	0.10	0.10
Total Vancouver	3.92	4.12	4.34	5.35	5.35	5.65	5.85
P.R. Fairview	0.50	0.90	1.35	1.60	1.80	1.80	2.00
South Kaien						2.50	3.00
Total Prince Rupert	0.50	0.90	1.35	1.60	1.80	4.35	5.00
Total TEUs	4.42	5.02	5.69	6.95	7.15	10.00	10.85

DTRRIP is the Deltaport Terminal Road and Rail Improvement Project to increase capacity at Deltaport by 600,000 TEUs by 2017 (actually taking longer)

5. Only 10% of Vancouver’s import laden containers are for the Lower Mainland

The RBT2 Project is planned to accommodate import containers from Asia. Only 10%³ of the import containers are for Vancouver and the Lower Mainland.

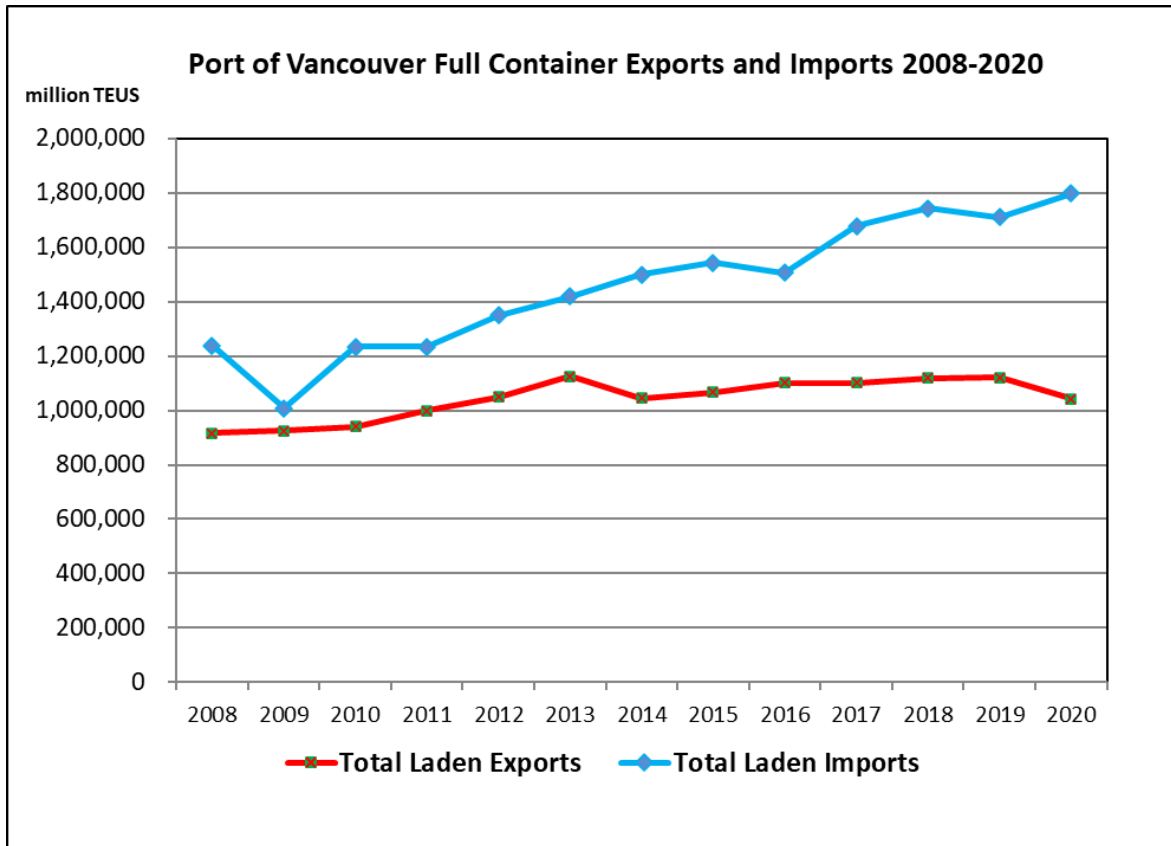
6. Growth in the container business is import containers from Asia bound for the U.S.

The main growth in Vancouver’s container business is to funnel import containers from Asia, through Canada, to the United States. Statistics 2015-2018 show that 23.5% of Vancouver container imports are US bound.⁴ Recent news claims it is as high as 35% which accounts for all business increases.⁵

7. RBT2 EIS fails to provide data or sufficient information to support a business case for RBT2

The Environmental Impact Statement (EIS) does not provide data, tables or references on the Port of Vancouver container business. Four graphs purport to show forecasts and west coast container capacity but there are no data or tables. One graph, purporting to show that forecasts have proven accurate, uses an out-of-date report from 2001. There is reference to an Ocean Shipping Consultants Report, 2016, to support capacity numbers, but no specific page numbers or data are referenced.⁶

8. RBT2 EIS fails to disclose that Vancouver container exports have been flat since 2011



Port of Vancouver Full Container Exports and Imports 2008-2020

	Laden Exports	Laden Imports
	TEUs	TEUs
2008	915,465	1,238,350
2009	925,411	1,007,304
2010	940,921	1,233,051
2011	999,725	1,234,585
2012	1,048,824	1,349,375
2013	1,125,619	1,418,527
2014	1,045,676	1,499,507
2015	1,066,034	1,542,388
2016	1,100,686	1,505,942
2017	1,101,645	1,677,800
2018	1,119,590	1,743,399
2019	1,121,973	1,709,398
2020	1,043,069	1,797,582

Source of Information; Port of Vancouver, Reports, Statistics and Resources, [Container-Statistics-Monthly-2008-2020](#)

9. The Port of Vancouver is sending out misinformation

In the news and in a Newsletter, April, 2021,⁷ the Port of Vancouver states without RBT2, “farmers, producers and businesses will have difficulties shipping commodities.” This makes no sense as Vancouver’s container exports have been flat since 2011. The Port of Vancouver should be focusing on bulk shipping which is the real backbone of Canada’s economy. Instead, the Port is squeezing out Vancouver businesses for container space. The Port continually buys up real estate and profits by utilizing taxpayers’ assets of 1,500 hectares of land and 16,000 hectares of water lots.

47%⁸ of the Port’s very lucrative business income is from the container business so the Port exaggerates the need for more container capacity and bullies export tenants with higher rents and threats of not renewing leases.⁹

The April Newsletter also contains misleading information with two extraordinary graphs purporting to show that the \$3.5 billion RBT2 Project is needed and that Canada’s west coast ports will run out of container capacity without RBT2. No statistics or specific references are provided.

The first graph shows that Canada’s west coast container business, without RBT2, is limited to a capacity of 6 million TEUs until 2060. (*A TEU is a twenty-foot container equivalent unit.*) The Port omits to include ongoing planned expansions in Vancouver and at Prince Rupert that will provide a capacity of 10 million TEUs by 2030, if needed, without destroying the Fraser River estuary for RBT2.

Both Port graphs show unrealistic, high forecasts which is astonishing considering that the Port of Vancouver’s lowest forecasts for the past 20 years have not been realized.

10. It is not true that Vancouver-bound containers will have to be re-routed through US Ports

The Port of Vancouver repeatedly states that if RBT2 is not built, containers bound for the Port of Vancouver will have to be re-routed to the US West Coast due to shortage of capacity. This is not accurate, especially considering that the opposite is true. 23.5% of inbound containers at the Port of Vancouver are US bound. As documented above, the west coast container business will have sufficient container business capacity without RBT2.

11. Review Panel refused to consider container business capacity at the Port of Prince Rupert

The Review Panel of the Roberts Bank Terminal 2 Environmental Assessment is on record as formally refusing to allow oral submissions to the Public Hearings on the Port of Prince Rupert.¹⁰ The Review Panel would not consider evidence that the Roberts Bank Terminal 2 Project is not needed because the Port of Prince Rupert, combined with Port of Vancouver, has the capacity to handle significant growth in the west coast container business for decades.

From the outset of the environmental assessment of the Roberts Bank Terminal 2 Project (RBT2), it was the understanding of the public, and the Proponent, the Port of Vancouver, that the Port of Prince Rupert, as well as the Port of Vancouver, serve the purpose of meeting Canada’s west coast container business demand.

The statistics provided in the RBT2 Environmental Impact Statement (EIS) address the west coast container business, not the container business of the Port of Vancouver. Furthermore, the RBT2 EIS stated ‘Purpose’, ‘Rationale’, ‘Objectives’ and “Alternative Means’ are presented as meeting west coast container business demand, not Vancouver area demand.

Hundreds of submissions to the RBT2 proposal opined that the container business at the Port of Prince Rupert had shipping advantages over the Vancouver area; would not cause the same traffic congestion and pollution; would provide employment opportunities in an appropriate community; and would cause less environmental degradation.

12. Change in scope after 5 years negates public input, and censors important information

After 5 years of environmental assessment, and 4 months prior to the Public Hearings, the Review Panel announced a convoluted interpretation of *CEAA 2012* and claimed it would not consider the option of the Port of Prince Rupert. Changing the scope after years of assessment is a wrongful act by the Impact Assessment Agency. It is illogical to assess RBT2 in terms of only the Lower Mainland when the EIS information and stated purpose of RBT2 is to meet the west coast container business demand.

13. Review Panel process banned consideration of Report by transportation experts

By refusing to appropriately consider RBT2 in terms of container business capacity on Canada's west coast, the Review Panel assessment failed to consider a government-commissioned report from three independent transportation experts who advised that:

"...policy makers develop container capacity in Prince Rupert before making investments in Vancouver" ...and further that: "...a systematic approach be taken to achieve an understanding of port capacity before a conclusion is reached that a particular port must necessarily be larger."¹¹

14. There is no oversight on Port's claims

The Port of Vancouver presents port operations as being limited to 85% of maximum capacity. This raises questions because engineering requires incorporation of limiting factors in the initial assessment of capacity, not after the port capacity has been calculated. If the Port of Vancouver cannot operate to capacity, then it is another reason to question the efficiency of Vancouver area ports. In 2015, the Fairview Container Terminal at the Port of Prince Rupert operated over capacity.

"Fairview's original capacity was 500,000 TEUs annually, although effective management and an efficient workforce enabled it to reach 776,412 TEUs in 2015"¹²

There has not been an independent review of the Port of Vancouver's statistics on the viability of RBT2. In January, 2019, the Port made a presentation to the Review Panel claiming an independent review but it turned out the reviewing company and the company that authored the Port reports had the same owner.

As mentioned above, the Port of Vancouver has not submitted specific data, tables, and statistics. Furthermore, the RBT2 Environmental Impact Statement (EIS) did not provide a feasibility study or a cost/benefit analysis, a standard requirement of credible business proposals.

As the Port of Vancouver is a government agency, the Government of Canada should be demanding a higher level of assessment than it would for a private company. Unfortunately, this is not the case as expressed in numerous submissions from the public. In fact, submitted concerns about government agencies in Ottawa withholding information and reports are being ignored.¹³

15. Insufficient information on economic impacts & concerns of significant job losses with RBT2

The International Longshore & Warehouse Union – Local 502 submitted concerns of job losses resulting in unemployment in the transport sector and revenue losses in local communities:

“...it is our submission that this will result in very significant job losses for longshore workers and hundreds of millions of dollars of lost wages and lost inputs for the community of Delta, in particular. This will be coupled with tens of millions of dollars of lost Federal, Provincial and municipal tax revenues.”

“We take this position RBT2 or any similar project that has the potential to cause serious economic harm to our workforce and to our community.”

The Union further stated insufficient information on the social and economic impacts and a lack of real data:

“We ask the panel to extend deliberations if you are unable to fully understand and quantify the economic and social impact of RBT2 until such time as you have sufficient and reliable data to fully determine whether or not RBT2 will have serious economic and social impacts on longshore workers and the community of Delta.

Simply put, RBT2 make no sense if on the one hand the construction of the project is found to be environmentally sound while the actual operation of the terminal causes significant job loss and harm to the community and the larger economy”¹⁴

16. Port of Vancouver wants taxpayers to fund RBT2 and squeeze out the Port’s own tenants

Originally proposed in the early 2000s, to date there is no private sector company willing to bid on the \$3.5 billion RBT2 Project. RBT2 will be the costliest port expansion in Canadian history.¹⁵

Instead of considering the best options for Canada’s west coast container business, the Port of Vancouver continues to promote RBT2, inferring this government agency will build RBT2 itself. As a result, the tenants of the Port of Vancouver will become the Port’s competitors disrupting Vancouver’s transportation operations and existing employment.

17. Cost to Taxpayers is \$3.5 billion and counting

Taxpayers will be expected to pay the \$3.5 billion cost and let the Port of Vancouver utilize public assets. Even if foreign investment is secured, taxpayer dollars will be required to fund millions in related infrastructure and mitigation measures. Tax dollars will be required to fund road and rail upgrades which will cause further congestion and pollution in the lower mainland.

Taxpayers have been funding the Asia-Pacific Gateway and Corridor Initiative for decades. In 2015, the federal government announced \$16.5 million for transportation infrastructure projects in B.C:

“To date, the Government of Canada has invested close to \$1.4 billion in APGCI infrastructure projects.”¹⁶

The recent Deltaport Terminal Road and Rail Improvement Project and Truck Staging Project cost taxpayers \$18.3 million. Now the Port of Vancouver wants taxpayers to pay \$3.5 billion to destroy Fraser River estuary globally-significant habitat to funnel import containers from Asia, through Canada, to the U.S.

References

ⁱ Actual TEUs for the Port of Vancouver: Port of Vancouver, Reports, Statistics and Resources, [Container-Statistics-Monthly-2008-2020](#)

Actual TEUs for the Port of Prince Rupert: reports and news items: Fairview Terminal Reaches [1 million TEU Milestone](#), Dec. 18, 2018. Port of Prince Rupert Delivers [Another Record Year; Cargo Volumes](#).

² Capacity According to the Port of Vancouver: [Ocean Shipping Consultants Report, 2016](#). Page 113. Increases for the Deltaport Terminal Road and Rail Improvement Project (DTRRIP) are shown a little later than forecasted as the Projects have taken longer than predicted. Capacity after 2020 is taken from the RBT2 EIS Statement, Figure 2.4. which references OSC 2016 but the graph is not in the report and is presumably calibrated from some information there. Tables and specific references were not provided.

Capacity According to the Documented Information: References are at the end of this document.

Actual TEUs for the Port of Vancouver: Port of Vancouver, Reports, Statistics and Resources, [Container-Statistics-Monthly-2008-2020](#)

Actual TEUs for the Port of Prince Rupert: reports and news items: Fairview Terminal Reaches [1 million TEU Milestone](#), Dec. 18, 2018. Port of Prince Rupert Delivers [Another Record Year; Cargo Volumes](#).

References for statistics on west coast container business capacity

The Boundary Bay Conservation Committee submitted statistics and references to the Roberts Bank Terminal 2 Environmental Assessment, Document # 1421, February 3, 2019.
<https://www.ceaa-acee.gc.ca/050/documents/p80054/126685E.pdf>

Deltaport - While there has been conflicting statistics on Deltaport container capacity for decades, the bottom line for announced capacity is 3 million TEUs once the current upgrades of the *Deltaport Terminal Road and Rail Improvement Program (DTRRIP)*, 2012, are completed. The upgrades have occurred at a slower rate than planned.

The study for the Deltaport Road and Rail Improvement Project (DRRIP) confirms that Deltaport, without RBT2, can handle 3 million TEUs by 2020. The road and rail upgrades have added capacity of 600,000 TEUs and the associated upgrades will further increase capacity.

Projections of Vessel Calls and Movements at Deltaport and Westshore Terminals, Deltaport Terminal Road and Rail Improvement Project (DTRRIP), November 28, 2011, pages 21&22
<http://www.robertsbankterminal2.com/wp-content/uploads/Projections-of-Vessel-Calls-and-Movements-at-Deltaport-and-Westshore-Terminals.pdf>

It appears further efficiencies could raise the capacity to 3.2 million TEUs.

Vanterm - New cranes arrive in Vancouver harbour for container terminal expansion, K. Chan, 11/26/2020

“GCT is spending \$160 million to densify and modernize GCT Vanterm, which will increase the terminal’s capacity by about 25% — from 835,000 TEUs to over one million TEUs annually.”

<https://dailyhive.com/vancouver/vanterm-terminal-container-expansion-new-cranes>

Centerm - “The Vancouver Fraser Port Authority is pushing ahead with the construction of the Centerm Expansion Project, which will increase the port’s capacity from 900,000 TEUs to 1.5 million.”

Centerm expansion project full steam ahead, Zlatan Hrvacevic, April 2, 2021,

<https://www.dredgingtoday.com/2021/04/02/centerm-expansion-project-full-steam-ahead/>

Fraser Surrey Docks, FSD

FSD has capacity for 600,000 TEUs but is handling about 100,000 TEUs per year.

In 2005, Fraser Surrey Docks spent \$190 million on expanding container capacity to 600,000 TEUS. Then its main customer transferred to another Vancouver Terminal.

Container docks in Surrey idle after \$190m expansion, Vancouver Sun, June 21, 2006

<http://www.canada.com/vancouver/news/story.html?id=243c5a27-053e-49c4-8bde-f94f9ffef45d>

Port of Prince Rupert, Fairview

“An anticipated \$2 billion in capital expansion projects starting in 2020 was expected to support further cargo growth, including DP World’s Fairview Terminal expansion project that will bring the terminal’s capacity up to 1.8 million TEUs by 2022.”, Business in Vancouver, Prince Rupert port plans cargo volume doubling by 2040, Jeremy Hainsworth, Oct. 27, 2020.

<https://biv.com/article/2020/10/prince-rupert-port-plans-cargo-volume-doubling-2040>

Port of Prince Rupert, South Kaien

“The Prince Rupert container terminal master plan released this week outlines projects that will potentially add 6-7 million TEU of capacity...A long-term project to build a second container terminal at South Kaien Island will add 2.5 million TEU of capacity, around the mid-2020s.”

Prince Rupert port plans to quadruple capacity, JOC.com, Bill Mongelluzzo, May 15, 2019

https://www.joc.com/port-news/international-ports/port-prince-rupert/prince-rupert-port-quadruple-capacity_20190515.html

³ Port of Vancouver Public Consultation, Deltaport Terminal Road and Rail Project, (DTRRIP), Dec.10, 2011, Page 6

http://www.portmetrovanancouver.com/Libraries/PROJECTS_CCIP/9_-_Open_House_-_Delta_-_DTRRIP_Consultation_December_10_2011.sflb.ashx

1. ⁴ RBT2, EIS, Analysis of BC Ports Container Volume by Origin/Destination Mercator Report, March, 2019, Page 6,
2. [Mercator Report onf BC Ports March 2019.pdf](#)

⁵ GCT: Port Authority’s proposed Roberts Bank expansion costly and misguided, Delta Optimist, May 18, 2021

<https://www.delta-optimist.com/sponsored/gct-port-authoritys-proposed-roberts-bank-expansion-costly-and-misguided-3788700>

3. ⁶ RBT2, EIS, CEAA 80054, [Container shipping and the Port of Vancouver](#), January 30, 2019, Document #1405, Slides 32,33,34 & 37/66.

⁷ Newsletter, April, 2021, Container traffic forecast. <https://www.robertsbankterminal2.com/news-updates/container-traffic-forecasts/container-traffic-forecast-2020/>

⁸ 47% of Port's business income is from the container business
Vancouver Fraser Port Authority 2018 Financial Report, Scrolled Page 21/58
https://www.portvancouver.com/wp-content/uploads/2019/05/2018_FinancialReport.pdf

⁹ Bullying tenants: Container Plans put pressure on Port of Vancouver tenants, neighbours, Vancouver Sun, Derrick Penner, February 19, 2021.

¹⁰RBT2, EIS, CEEA 80054, May 30, 2019, Documents [#1843](#) and [#1849](#), From Review Panel Secretariat, re: Participation in the Alternative Means topic specific session on May 31, 2019

4. ¹¹ Asia Pacific Gateway and Corridor Initiative Report, Advisors Report, 2008, Burghadt, De Fehr & Turner

¹² One million TEUs marks Prince Rupert container terminal milestone, November 18, 2019
<https://canadiansailings.ca/one-million-teus-marks-prince-rupert-container-terminal-milestone/>

¹³ Government interference in proposed Roberts Bank Container Terminal 2, Common Ground, Nov. 16, 2019
<https://commonground.ca/government-interference-in-proposed-roberts-bank-container-terminal-2/>

¹⁴ RBT2, EIS, CEEA 80054, International Longshore & Warehouse Union – Local 5012, Closing Remarks, August 28, 2019, Document [#2049](#)

¹⁵ Marko, Dekovic: There's a better way to add needed [container capacity at Roberts Bank](#), The Province, July 22, 2019

¹⁶ Feds invest in Asia-Pacific Gateway infrastructure, July 29, 2015
<https://www.insidelogistics.ca/infrastructure/feds-invest-in-asia-pacific-gateway-infrastructure-141294/>