

April 27, 2023

Ports for Containers, Jet Fuel, LNG, and Imported Slag are industrializing the Sacred Fraser River, Estuary and Salish Sea, B.C.

Governments are accepting paid-for science that is not peer reviewed, or published

Failure to provide proven mitigation - contravenes legislation

Ignoring evidence-based science

Loss of globally-significant habitat

Skewed environmental assessment reports

Species at Risk

No credible cumulative effects assessment

Failure to consider public input

Madam Justice Dillon: "If citizens can't trust the process, then where are we?"¹

On April 20, 2023, the Government of Canada announced approval of the Roberts Bank Container Terminal 2 Project in the south arm of the Fraser River Estuary, Delta, B.C. This is yet another major project that will cause the irreversible destruction of Canada's Most Important Bird Area; the once-boasted, "*greatest salmon producing river on earth*"²; and the feeding region of the endangered southern resident killer whales.



Mega Port and Plant Projects for Containers, Jet Fuel, LNG, and overseas slag will destroy irreplaceable habitat of millions of migrating western sandpipers who depend on estuarine mud-flat biofilm

In 2013, approval was given to the Vancouver Airport Fuel Project, about 20 km. upstream from the Fraser Estuary. The Project includes a marine port for receiving vessels carrying jet fuel, 6 storage tanks, and a pipeline to the Vancouver airport. A court challenge failed but Madam Justice Dillon stated the public had been, "*constrained by the law and disengaged from the environmental process.*"

DANGER: Planned FortisBC Tilbury LNG Plant and Port under Environmental Assessment – across the river from the Jet Fuel Marine Terminal and Storage Tanks!!!

In violation of International Safety Standards

¹ Comments from Madam Justice Dillon, January 22, 2016, in reference to her ruling that refused to award costs to the Vancouver Airport Fuel Facility Corporation, VAPOR v. British Columbia, June 24, 2015

² Posting in the BC Museum, Victoria, B.C. Estuaries in B.C. March, 2006, B.C. Ministry of Environment

Bypassing legislation with convoluted language, the Governments of B.C. and Canada claim they can assess the LNG Plant and LNG Port as two separate Projects. This inappropriate Project Splitting is to avoid the highest level of environmental assessment in Canada, a federal Review Panel.

Without environmental assessments, the FortisBC Tilbury LNG operations have already been permitted large increases in liquefaction and storage. Now FortisBC plans an increase to a major plant for liquefaction and storage, as well as an LNG port, on site, to export 3.5 million tonnes of LNG annually. The plans include local bunkering creating more pollution and danger.

Just upstream from the LNG Plant, is Lehigh Cement's plans for the Delta Grinding Facility and a marine terminal for Panamax-sized vessels importing Granulated Blast Furnace Slag (GBFS) from overseas plants in Asia and Europe.

The newly approved Roberts Bank Container Terminal 2 Project will dredge and fill 460 acres of the globally-significant Fraser River Estuary to build a man-made island, the size of 250 football fields. Evidence-based scientific information confirms that this massive island for a container port will cause unmitigable, irreversible harm to the Fraser River, estuary, and watershed. Both Government and independent scientists warn of unmitigable risks to the ecosystems.

With piece-meal approval of these massive Projects, the Governments are failing to follow legislation which requires a credible cumulative effects assessment of all Projects. Most of the project sites are red-zoned, critical habitats where, historically, development was not permitted.

Collectively, these mega Projects will cause:

- a large increase in shipping vessels in the lower, winding Fraser River; through the estuary; and through the narrow shipping lanes of the Salish Sea
- danger for wildlife and people with too many vessels in narrow waterways, some carrying jet fuel or LNG
- likely ecosystem collapse (*already occurring*) with significant residual adverse environmental effects on shorebirds; fish and fish habitat; endangered Southern Resident Killer Whales (SRKW); coastal birds; and several species at risk
- air, light, noise, and water pollution, including pollution from dredge, fill, site operations, and shipping
- upstream and downstream effects of fracking, liquifying, transporting and converting LNG

Governments are ignoring the high level of public concern and commitments to international, national, and local Designations and Agreements such as:

- Canada's major stopover for migratory birds of the Pacific Flyway travelling between 3 continents and 20 countries
- Canada's Most Important Bird Area (IBA)
- a Ramsar Wetland of International Significance (RAMSAR)
- a Western Hemisphere Shorebird Reserve Network (WHSRN) site
- a B.C. Wildlife Management area
- the Pacific Salmon Treaty
- the Convention on Biological Diversity
- US-Canada Cooperation in the Salish Sea

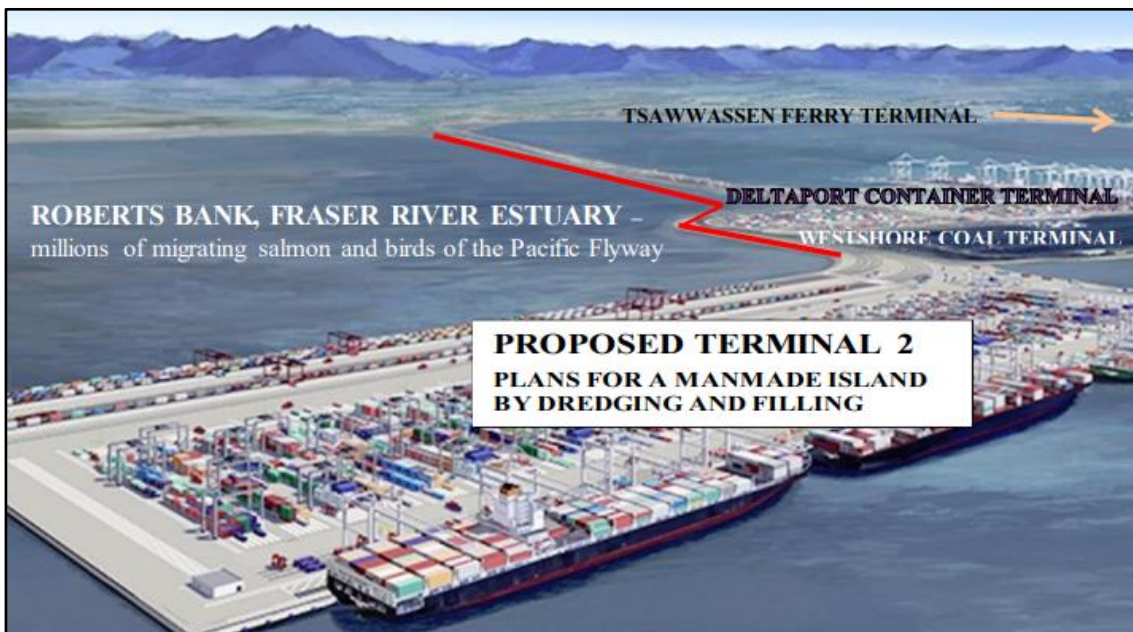
Overview Map of the Fraser River Estuary, Environment and Climate Change Canada, November 17, 2017, Submission to Review Panel of Roberts Bank Environmental Assessment, Page 18/22

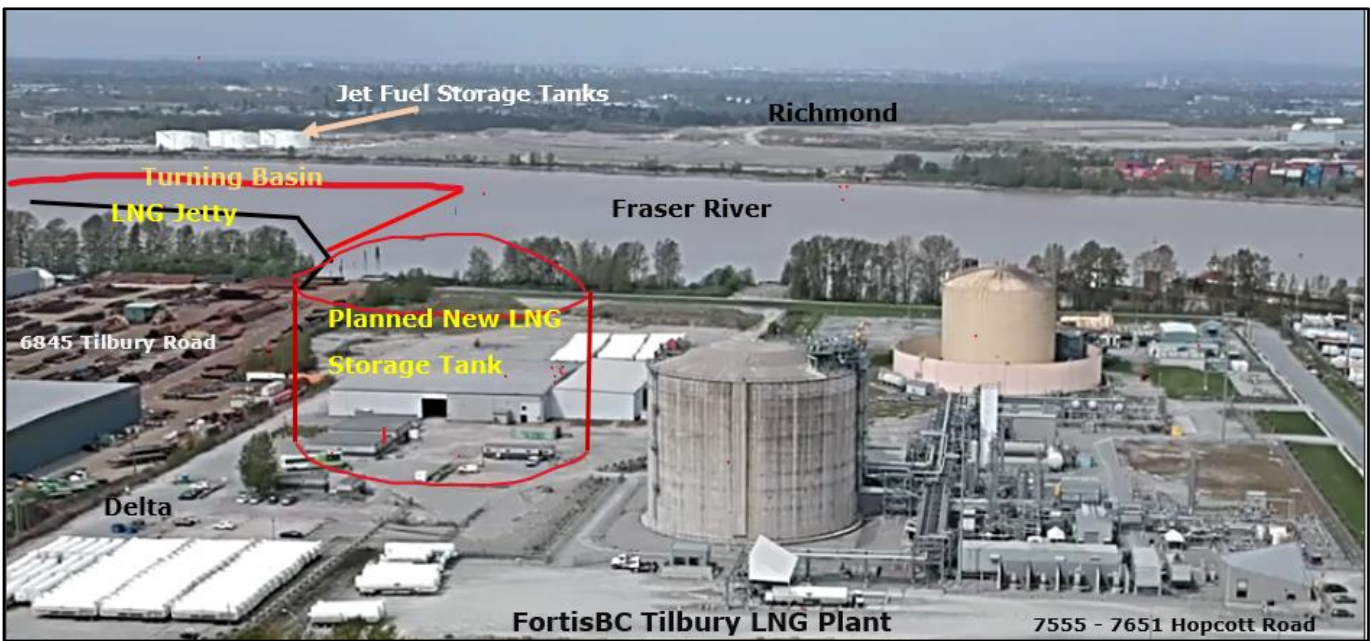
<https://iaac-aeic.gc.ca/050/documents/p80054/121072E.pdf>

arrow points to FortisBC LNG plant and planned port. Jet fuel port and tanks are across the river



Red arrow points to Robert Bank Container Terminal 2 Project
The coloured lines are conservation areas. The violet areas are RAMSAR sites.





Ignored Burrard Inlet Environmental Action Program and Fraser River Estuary Management Program
 Red-coded is High Productivity meaning it includes productive and diverse habitats that support critical fish and wildlife functions. Now ignored by Governments of Canada and B.C.