

## Why the Roberts Bank Terminal 2 Project in Delta BC Must Be Abandoned

1. Based on all the evidence the RBT2 project must be abandoned because it will introduce significant adverse environmental effects that will be immediate, continuous and cannot be mitigated.

The recently concluded RBT2 Environmental Assessment Panel Public Hearings answered a number of questions:

a). Would building RBT2 result in significant adverse environmental effects that cannot be mitigated?

ANSWER – YES

b). Does Sec 19.1 (a) of CEAA 2012 (environmental effects, cumulative effects and their significance) apply?

ANSWER - YES

The risks are known and documented by Environment and Climate Change Canada submissions to the Panel e.g. Salinity Trigger – demonstrating there are species level risks. <sup>1</sup>

c). Is RBT2 in the national interest?

ANSWER - NO

d). Are there locations elsewhere in BC, other than Roberts Bank, that can provide all the container capacity and expansion necessary to meet Canada's trading needs at less cost and with little or no environmental risk, without ever building RBT2? <sup>2</sup>

ANSWER – YES

e). Is there otherwise a need for a second container terminal on Roberts Bank?

ANSWER – NO

- No economic justification. Business case is lacking.
- Plenty of capacity on the BC West Coast for Canadian trade.
- Prince Rupert is able to expand to satisfy trade demand.
- Equivalent capacity to RBT2 readily available

2. Based on evidence submitted to the Panel and the three weeks of Public Hearings:

a) The Review Panel must reject RBT2 on environmental grounds, because:

- ✓ RBT2 will result in immediate and continuous significant adverse environmental effects that cannot be mitigated
- ✓ Both regulatory authorities - ECCC and DFO - have opposed the development on environmental grounds that are within their mandate to control.

b) The VFPA environmental science on biofilm dynamics has been challenged and shown to be biased and false:

- ✓ ECCC hearing submission undertaking # 29 proved that if built RBT2 will turn off the salinity trigger and deplete the biofilm quality that is essential to migratory shorebirds. <sup>1</sup>
- ✓ Independent experts presenting at the hearing showed the VFPA science to be incorrect and the negative environmental effects to be significant. <sup>3</sup>
- ✓ Not one independent expert scientist has come out in support of the VFPA science, or made presentations at the hearings.
- ✓ Over 70 public hearing participants opposed RBT2 on environmental grounds.

c) The Oceans Act<sup>4</sup> makes it clear. Maintaining biological diversity and productivity in the marine environment is important and must follow the precautionary principle.

3. There is scientific consensus - the scientific evidence for negative RBT2 consequences are real. The precautionary principle applies:

- a) ECCC studies, hearing presentations and undertakings all identify significant adverse environmental effects that are immediate and cannot be mitigated.<sup>5</sup>
- b) DFO identified significant issues and concerns regarding risks to fish and fish habitat.<sup>6</sup>
- c) Meeting minutes (CEAA Registry #1939) show VFPA has known about these concerns since 2003 and have ignored them.
- d) Independent scientific consensus is that RBT2 introduces huge environmental effects that are immediate and cannot be mitigated.<sup>3</sup>

4. Negative environmental impacts

- a) ECCC states that RBT2 port expansion degrades inshore habitat containing Biofilm – essential to many shorebirds, salmon and other wildlife.
  - ✓ RBT2 turns off salinity trigger, depletes biofilm quality <sup>1</sup>
  - ✓ Expanded causeway covers over biofilm
- b) Blocked routes for salmon transitioning from river to ocean, putting juvenile salmon at even more risk.
- c) Species level risks to migratory birds, especially Western Sandpiper.
- d) Species level population declines – to shorebirds.
- e) Potential to break the chain of the Pacific Flyway.
- f) Species at Risk Act – puts endangered species at risk.
- g) Violates international treaties, trans boundary harm.
- h) Man made island changes tidal flows, and coastal geomorphology, permanent loss of wetlands.
- i) Expanding the causeway eliminates a significant area of biofilm.
- j) Puts Endangered Orcas at even more risk.
- k) Degrades critical stopover on Pacific Flyway for millions of shorebirds, creating species level risks.
- l) Ignores provisions of the Migratory Birds Convention Act.

5. Possible Mitigation Measures

There are none. Environment and Climate Change Canada states in registry submission #1146:

*“there are no accepted techniques to remediate for biofilm on intertidal mudflats, mitigation for this habitat loss is not possible”.*<sup>7</sup>

6. Host City of Delta is opposed

Immitigable community impacts resulting from RBT2 – road and rail traffic, congestion, noise, air and light pollution.<sup>8</sup>

7. VFPA Mandate

Canada Marine Act - Port Mandate is to Facilitate Canadian Trade:

- a) Handling US containers not part of mandate – 27.4% handled on the Canadian West Coast are US containers. Building RBT2 for US containers violates the mandate.
- b) Vancouver gateway: 80% plus are Eastern/US containers.
- c) The rail route east is heavily congested.
- d) Canadian volumes are flat, US volumes increasing.
- e) There is no Capacity/ Container Crunch.
- f) Plenty of west coast container capacity. No proof that capacity will run out by mid 2020s as VFPA suggests.

## 8. No Business Case for RBT2

The VFPA contention, repeated often, is that container capacity will be constrained ("Container Capacity Crunch") by the mid 2020s. This is invalid, flat out wrong, as proven by their own statistics. In fact independent reports confirm that there is plenty of capacity to satisfy Canada's trading needs until the 2030's. The facts are as follows:

a). At year end of 2018, west coast Canada container capacities (TEU, twenty foot equivalent units) were as follows:

- Roberts Bank GCT Deltaport - 1.8M TEU
- Inner Harbour GCT Vanterm - 0.835M TEU
- Inner Harbour DP World Centerm - 0.9M TEU
- Fraser River DP World Fraser Surrey Docks - 0.45M TEU
- Prince Rupert DP World Fairview - 1.35M TEU

Total West Coast Canada Capacity – 5.335M TEU

b). 2018 actual volumes were 4,417,798, amounting to capacity utilization of 82%, which is below the 85% utilization threshold that VFPA recommends. The terminal expansions projects have been permitted and will be completed by the end of 2022:

- Roberts Bank GCT Deltaport – plus 0.6M TEU
- Inner Harbour DP World Centerm – plus 0.6M TEU
- Inner Harbour GCT Vanterm – plus 0.217M TEU
- Prince Rupert DP World Fairview – plus 0.45M TEU

Total West Coast Canada Capacity - 7.202M TEU.

c). 2019 actual VFPA volumes to July show a lacklustre performance. Overall the increase over the same period for 2018 is 3.2% much of which is empty containers (TEUs). Imported laden containers increased by less than 1% over 2018, a mere 9,000 TEUs. Laden exports increased by 4.7% for a total laden container increase of only 2.4%, yet Prince Rupert continues to grow at 12%.

The VFPA forecast, prepared by Ocean Shipping Consultants (OSC), estimates a base case of 5.810M TEU for 2025. With the additional capacity coming online in 2022, capacity utilization would drop to 80% or less in 2025.

The VFPA statement that the west coast will run out of capacity by mid-2020's is false and misleading.

## 9. Conclusion

Roberts Bank:

- a) The very crucible of the Fraser River and Estuary.
- b) Its wetlands and habitat must be protected from any further port or industrial development. This includes the biofilm that is unique, rich and a critical food source for millions of shorebirds, fishes and other wildlife,
- c) Coastal Birds, Marine Birds and Migratory Birds will all be negatively impacted.<sup>9</sup>
- d) Together with the Salish Sea it supports the endangered Southern Resident Killer Whales. No further development in their habitat can be allowed.
- e) Its environmental values are immense. Damage to this area will be an international embarrassment to Canada.

The Roberts Bank Terminal 2 project must be abandoned.

## 9. References

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