

Dear Against Port Expansion Community Group Supporters and Members of the Public:
October 13, 2023
Governments Have Betrayed The Environmental Values of the Fraser Estuary

As Executive Director of Against Port Expansion Community Group I write to you, APE Supporters and Members of the Public after reflecting on Victoria's approval of Roberts Bank Terminal 2 (RBT2), which effectively ends attempts to stop RBT2 within the federal and provincial legislative framework established to carry out environmental assessments and make decisions.



This is the migratory bird that defines the importance of Roberts Bank as a critical stopover on the Pacific Flyway. The BC Government's approval of the Roberts Bank Terminal 2 (RBT2) project, on September 28 2023, (following the federal approval in April of this year), means this bird species - the Western Sandpiper - will now see further population declines towards potential extinction. The battle to stop the environmental destruction of the Roberts Bank ecosystem is effectively over. All that is now required for construction to start is an approval

from the Department of Fisheries and Oceans and that is a given.

Our small community group, Against Port Expansion, has done everything we can to try to stop the environmental degradation of Roberts Bank and South Delta. Each one of you has contributed in one way or another to our extensive research, running protests and rallies, holding public information meetings, participating in public hearings, issuing regular media releases and updating the public generally. For our size we have garnered more media attention on RBT2 than many of the major groups.

People are angry. Rarely have I seen the level of anger and disgust expressed by the many. Here is but one example of many: *"I no longer believe anyone in power has the guts to do the right thing. Knowing that the GCT (Deltaport Berth 4) application is in the wings, all I can think ultimately is influence and corruption. Obviously none of them really cares for life on this planet and everything they say is totally hypocritical - and everything they do is cowardly"*

Delta residents and others are justifiably angry when they see not only their concerns ignored but also those of both government and independent scientists. Theirs is an increasing distrust of government.

Governments let us down – again. They violated their environmental principles, ignored the science and abandoned the Roberts Bank ecosystem in favour of those who will benefit from destroying the most important ecosystem on the West Coast of Canada. They bowed to the interests of developers who built infrastructure on the understanding Roberts Bank Terminal 2 would be approved. Our elected officials betrayed us, in particular Carla Qualtrough the MP for Delta. Other than during the last election, when she made some vague comments about the lack of a business case, she has been silent both before the decision and afterwards.

Up until Victoria's issuance of the EA certificate there was hope that Victoria would at least defer approval. The BC legislation provides for deferral but Ministers Heyman and Fleming chose not to.

The BC government had already started the environmental assessment of Deltaport Berth 4, which will provide almost the same capacity as RBT2 at less than half the cost, within the same time frame and without the environmental damage. Why did they not wait until the DP4 assessment is complete before making a decision on RBT2?

I now believe governments' decision to approve RBT2 was likely made years ago. The ensuing public comment periods were nothing more than a check the boxes exercise.

Damage to our unique environment and the wildlife that relies on Roberts Bank, has always been the foundation for the huge opposition to RBT2. But it is more than that. People are well aware of compelling evidence that there are better more environmentally sustainable alternatives. They also know that the container terminal marketplace is changing such that a second container terminal on Roberts Bank, as an addition to the five other terminals on the BC West Coast, may never be needed.

The Port continues to repeat the myth that west coast terminals will reach capacity by the mid 2020s. Yet total container traffic was down by more than three percent in 2022 versus 2021. Worse yet 2022 full container loads were down by nine percent compared to 2021. In fact there were fewer loaded containers handled by the Port in 2022 than in every year all the way back to 2013. That dismal picture continues in 2023. Total container volumes for the eight months to August 2023 are off by 18 percent, with full imports falling by 19.5 percent compared to the same period in 2022. These reductions in container volumes are not solely the result of reduced consumer demand. The Port of Vancouver has always relied on handling significant volumes of US container traffic (as high as 25 percent), which adds nothing to the Canadian economy. But as several articles in Business in Vancouver and other publications have recently pointed out, the Port of Vancouver is losing that US traffic. More and more US containers are going by the all water route direct to US Gulf and East Coast ports. That trend will continue because it is cheaper and faster for shipping companies to get their goods to market. This is a fundamental and permanent change.

The management team at VFPA are obviously well aware of the falling volumes of container traffic. So why do they keep insisting that "west coast terminals will reach capacity by the mid- to late-2020s" (<https://www.robertsbankterminal2.com/wp-content/uploads/2023-09-25-RBT2-Why-were-building-Roberts-Bank-Terminal-2.pdf>) when they know this is not true?

Why do federal and provincial governments believe it is worth spending \$3.5 billion (quite likely to balloon to \$4-6 billion by the time it is built) on building RBT2, risking severe damage to the environment and potentially ending up with an underused terminal?

On its face this makes no sense, unless they are planning major changes in the configuration of Vancouver's container terminals. Could it be that RBT2 is not an expansion, but rather a consolidation of all container terminal operations in Delta? I believe this to be a real possibility and it will not be good news for Delta.

VFPA has hinted in the past (actually threatened) that they would close down the inner harbour container terminals. They have also said there is no long-term future for container operations at Fraser Surrey Docks (the port operator disputes this).

Is this a possible scenario? The two inner harbour terminals are decommissioned (perhaps along with other harbour operations such as West Coast Reduction Ltd.) and the inner harbour waterfront repurposed for non-industrial operations. There is plenty of precedent. The London Docklands used to be one of Europe's largest ports. Today its warehouses have

been converted to residential and recreational, accompanied by high-rise towers at Canary Wharf and elsewhere. Where did the container traffic go? The small seaside town of Felixstowe that now has one of the largest container terminals in Europe.

If this is the long-term game plan it is not good news for the environment, nor for Delta especially South Delta. Felixstowe has 47 railroad container trains in and out of that port each and every day. That could well be Delta's outlook plus huge expansions to semi trailer traffic to and from Roberts Bank. And there will be more bad news. Consolidation on Roberts Bank means more warehouses and logistics centres. That means the loss of more of Delta's agricultural land. Remember Robin Silvester's quote "Agriculture is emotionally important, but economically [of] relatively low importance to the Lower Mainland. And in terms of food security, [it] is almost meaningless for the Lower Mainland."

In past presentations I have sometimes compared Delta with Mira Loma, a small town in California. It was also a rural area with farmland and open spaces. But it was also at the confluence of several highways and railroads that served the major ports in Los Angeles. Today that rural area has been overtaken with warehouses and logistics centres. That could be Delta's fate.

Regardless of whether RBT2 is a reconfiguration of Vancouver container terminal operations or the addition of a new terminal, it is governments who are responsible for their collective failure to do proper due diligence, for their laziness, ignorance and double dealing. They ignored science, facts and evidence and their actions will lead to the degradation of the most important stop on the Pacific Flyway for millions of migratory and other shorebirds. Many scientists and environmental groups recognize the RBT2 project will be the environmental tipping point in terms of the Fraser Estuary and its ecosystem.

The irony is while these same governments acknowledge there will likely be significant adverse environmental effects from RBT2 they are still willing to sacrifice a world-class ecosystem for a container terminal that will never be needed. At no time will the BC West Coast ever be short of terminal capacity. Currently the BC West Coast terminals together have in excess of two million spare container terminal capacity. Additional capacity will not be needed until well into the 2030s and by then private operators will be capable of delivering more capacity than RBT2 at much less cost.

Deltaport Berth 4 can deliver an additional 2 million TEUs (containers) and within the same time frame. It will cost half as much as RBT2 and will be financed privately, unlike RBT2 that will be publicly funded. Prince Rupert and its operator DP World will finish the expansion of the Fairview terminal by 2024 delivering 1.8 TEUs. In addition Prince Rupert has now commenced a study for a second terminal that can deliver 2 million TEUs by 2031, also privately funded.

If market conditions warrant it by 2050 BC West Coast container terminals will be capable of delivering as much as 15 million TEUs of capacity, more than enough to satisfy Canada's West coast trading needs for the foreseeable future such that RBT2 will never be needed.

Furthermore RBT2 is still facing two legal challenges. One is from Ecojustice representing the David Suzuki Foundation, Georgia Strait Alliance, Raincoast Conservation Foundation, and Wilderness Committee, citing concerns for the health of local salmon and the endangered southern resident killer whales. The Lummi Nation has also filed for a judicial review of Ottawa's approval of the project, claiming it should have been consulted. In addition on July 12 the Union of BC Indian Chiefs wrote to the federal and

provincial governments calling for an immediate pause of RBT2 development.

There are also financial challenges. VFPA needs to borrow \$billions to build RBT2. All major financial institutions have adopted the Equator Principles for determining, assessing and managing environmental and social risk in project finance. Given RBT2's significant adverse environmental effects and the project's impacts on biodiversity financial institutions would be expected to avoid financing RBT2.

The RBT2 approval will result in the upset of the natural chemistry over Roberts Bank and the quality of its unique intertidal biofilm will be inexorably destroyed. This will have devastating consequences, resulting in a cascading failure of the estuarine ecosystem, up to and including commercial crab and salmon species, eulachon, already endangered southern resident killer whales, as well as migratory and other shorebirds. This catastrophe has all along been the major concern for government scientists as well as many independent scientists expert in their field. All of these scientists and their concerns have been ignored.

The Fraser Estuary, having lost over 80 percent of its natural habitat, is at an environmental tipping point. If RBT2 is built there will nothing that can be done to prevent a catastrophe. Will governments finally recognize that will be the environmental legacy of the decision to approve Roberts Bank Terminal 2 and make the decision to terminate the project? We can only hope.

But - It ain't over till it's over. More can still be done outside of the legislated decision-making. What can be done?

1. Write to:

- Provincial and federal governments asking them to justify the project, it's expenditures and the environmental damage.
- Financial institutions warning them that financing this project will violate the Equator Principles.
- The commercial entities that will bid to build and operate it (I have a list of potential operators)

2. Get an MP or MLA to ask a question in parliament and legislature.

3. Register support for the Mayor of Delta, who is also chair of Metro Vancouver. Delta is the city most affected and is opposed to RBT2 on multiple grounds. He could use support from individuals and environmental groups to bolster his case when meeting with federal officials.

4. Call on major environmental groups to call out the decision.

5. Offer support to Ecojustice, Lummi, and the Union of BC Indian Chiefs.

6. Get the media to raise questions in articles.

7. Initiate Access to Information (FOI) requests with the federal government to uncover details of what led to the cabinet decision. In Canada, unlike many other countries, cabinet decision are off limits but targeted FOIs to specific agencies will undoubtedly uncover more.

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Against Port Expansion Community Group