

## **NOT JUSTIFIED IN THE CIRCUMSTANCES, WHY THE BC PROVINCIAL GOVERNMENT MUST DENY ROBERTS BANK TERMINAL 2 APPROVAL. JUNE 5 2023**

I am totally opposed to the Roberts Bank Terminal 2 project approval. Therefore I am pleased to comment on the draft assessment material that Provincial Ministers will use to decide if the Vancouver Fraser Port Authority's (VFPA) Roberts Bank Terminal 2 (RBT2) project should be approved.

I am however very disappointed and concerned that you are asking for public comment when Premier David Eby already pronounced his support for the project some weeks ago. Your government gives the appearance that this is nothing more than a check the box exercise, because in fact you have already decided you are going to rubber stamp the federal approval. You should not do so.

Neither should you rely on the Federal Government's Decision Statement, which while recognizing RBT2 is likely to cause significant adverse environmental effects yet the Governor in Council determines these effects are justified in the circumstances.

You as the Provincial Government need to ask - What does Justified in the Circumstances mean?

Are you prepared to justify:

- Job losses
- Ecosystem degradation
- Compromising the ecological integrity of the last remaining natural large intertidal bank
- Curtailing fatty acid production from intertidal biofilm on Roberts Bank that will have cascading negative effects up the food web, impacting commercial fisheries, including salmon and crab, and apex predators such as Orca.
- Wildlife population declines with several at risk species potentially facing extinction
- Ignoring three BC cities all of whom oppose the project
- Ignoring major national and international environmental groups as well as thousands of scientists and citizens who all vigorously oppose RBT2

Attached is a full analysis of why the federal government made a bad decision that will end up being an environmental and economic disaster. BC must not make the same mistake.

There are several reasons why the BC Government must not approve the project as follows:

1. Protecting the environment and ecosystems that are under provincial responsibility
2. Protecting the BC economy and jobs and ensuring that BC container trade expansion is carried out in a sustainable manner to the advantage of BC communities and businesses and the BC economy overall
3. Ensuring the quality of life is protected for BC cities, municipalities and their residents in every part of the province.

In each of these areas the RBT2 project disadvantages and damages BC, its environment, businesses, its residents and the cities and municipalities they reside in.

## 1. Protecting BC Environment

Environment and Climate Change Canada (ECCC) in its environmental assessment has started repeatedly that the man made Island for the RBT2 Project will remove the salinity trigger for high fatty acid production by diatoms in biofilm on Roberts Bank in the Fraser River Estuary. Not only does this have species-level consequences for Western Sandpipers it negatively affects the entire intertidal food web. These shorebirds are the window into the ecological functioning of the Fraser River Estuary and reveal that the ecological integrity of the last remaining natural large intertidal bank will be compromised. Curtailing fatty acid production from intertidal biofilm on Roberts Bank will have cascading negative effects up the food web, impacting commercial fisheries, including salmon and crab, and apex predators such as Orca.

Although the federal government approved RBT 2, ignoring the ECCC science that does not mean the provincial government should do the same. ECCC demonstrates through their research that these effects will be permanent, irreversible, continuous and unmitigable.

BC cannot ignore this environmental damage. If you ignore the science and were to approve the project you will be signing the death certificate for the Roberts Bank Wildlife Management Area.

## 2. Protecting BC economy and jobs.

If BC approves the semi automated RBT2 project it will lead to job losses. If RBT2 were to be approved Vancouver cannot sustain the level of port jobs it has now. There will be job losses at Deltaport and the inner harbour terminals. RBT2 will introduce too much container terminal capacity in Vancouver, significantly more than the market will ever need

GCT, a Canadian company, operates two container terminals in Vancouver. The Port authority has stated it intends to contract another company to run RBT2. It will not be a Canadian company and GCTs business model will be negatively impacted. Vancouver's trade routes to the east, the destination and origin of the majority of container traffic, is already constrained. The rail route through the Fraser Canton is already at capacity. It is a bottleneck.

North American container traffic routings are changing. Volumes on the West Coast of Canada have plummeted throughout 2023. Vancouver YTD (to April) is down 15.0%, but March 2023 accounted for most of the drop, with volumes down from 331,000 TEU in 2022 to just 227,000 this year, a decline of 31.5%, which is massive. April YTD import volumes are down 18%. This is not a uniquely Canadian problem, but it does signal a permanent shift in the way container traffic is moving.

A lot of this has a lot to do with the lower freight differentials between Western Canada and the East Coast/Gulf routings making it more attractive to bring in containers through the EC/Gulf gateways and then up to Memphis/Chicago rather than going through West Coast ports.

While overall negative economic impacts are driving part of the West Coast Canada declines, a West-to-East shift is responsible for at least 50% of declines seen on West Coast ports. Shipping lines again have profitability challenges and terminal operators will be facing massive pressures as well. These are permanent shifts, not a temporary aberration.

Section 10 of the Draft Summary Assessment Report discusses additional considerations, but fails to review the underlying issues of Vancouver as the only BC Gateway to Asia

Here are the facts:

(a). West Coast container terminals will not reach full capacity in the mid to late 2020s as VFPA claims

- Current BC terminal capacity is 7.0 mill TEUs and the 2022 actual West Coast volumes are 4.6 mill TEUs.
- There is current spare capacity as high as 2.0 mill TEUs.
- 2022 container volumes through VFPA terminals declined by 3.3%. Full container loads in and out of Vancouver declined by 9% over 2021
- 2022 container trade is about equal to 2019, the last year prior to the pandemic.
- 2023 container trade went into steep decline. Vancouver YTD is down 15%
- The 14 year container compound annual growth rate (CAGR) for Vancouver languishes at 2.57%
- At the current level of growth West Coast actual volumes will approximate 5.8 mill TEUs by 2030 versus a capacity of 8. Mill TEUs
- West Coast will not be capacity constrained until 2033 or later by which time there will be additional expansion, still without the need to build Terminal 2 on Roberts Bank.

(b). Prince Rupert - on the West Coast - is increasing its container terminal capacity and it is time to diversify container trading routes.

- Its Fairview terminal is expanding and will increase to 1.8 mill TEUs by 2024.
- A second terminal is in the planning phase and by the early 2030s it will deliver another 2.0 mill TEUs if the market warrants it, with capability to increase to 5.0 million TEUs
- This will give the West Coast a combined capacity of 9.2 mill TEUs - sufficient to handle West Coast Container trade until at least 2040, by which time Prince Rupert will have further expanded.
- Prince Rupert is overall a superior trade route for containers. It is two sailing days closer to Asia, has a less congested and safer route into port, and an easier faster rail route over the Rockies compared to the congested rail route through the Fraser Canyon.
- Prince Rupert is a much better solution for when additional container terminal capacity is needed, with little to no environmental concerns

There are also significant financial aspects that may well sink the RBT2 project. The combination of massively increasing build costs; plunging volumes, and higher interest rates will render this project an economic disaster. VFPA's revenues will be severely impacted by this downturn and their ability to borrow will be impacted and it will only be a matter of time before they are back asking all levels of government to provide more financial support. The current stated cost of RBT2 - at \$3.5 billion - is likely to balloon to \$6 billion plus and BC will have an economic disaster on its hands.

### 3. Quality of Life for BC Cities, Municipalities across the Province.

Trade expansion must not detrimentally affect the quality of life. Three major lower mainland cities - Delta Richmond and White Rock - are all opposed to this project.

The Roberts Bank Terminal 2 Project negatively impacts residents and business as follows:

- Traffic congestion caused by port traffic on BC highways. RBT2 adds to that congestion. Even with the improvements underway for lower mainland highways port

truck and rail traffic will cause major traffic bottlenecks negatively impacting residents and businesses.

- RBT2 delivers a major blow to the Fraser Estuary, which has already lost over 80% of its natural habitat.
- Enjoyment of the Fraser Estuary will be compromised for hundreds of thousands of local residents. As well Brunswick Point is a major destination for the birding community and viewing area. Birding tourism delivers millions of dollars in tourism income. RBT2 extinguishes all those opportunities.
- Residents living in South Delta, including in the Tsawwassen First Nation as well as the Gulf Islands will suffer from increased noise, light and air pollution.

I urge you to listen to:

- ✓ three of BC's major cities;
- ✓ thousands of local residents;
- ✓ scientists;
- ✓ environmental groups;
- ✓ labour unions

And deny project approval for Roberts Bank Terminal 2.

**The April 20 2023 Federal Government Approval of Roberts Bank Terminal 2  
Is an Environmental and Economic Disaster  
– June 5 2023**

“Justified in the Circumstances” is the rationale given for the Federal Government’s April 20 2023 approval for the Vancouver Fraser Port Authority’s (VFPA) Roberts Bank Terminal 2 (RBT2) project. Questions that the Federal Government must now answer are?

- What circumstances justify massive environmental degradation of BC’s most important ecosystem?
- What does justified in the circumstances mean and Is RBT2 needed and economically viable?
- Why did the Federal Government ignore its own scientists, their concerns and their recommendation’s?
- How and why it got approved?
- What were the main triggers for approval?

Ecojustice on behalf of David Suzuki Foundation, Georgia Strait Alliance, Raincoast Conservation Foundation, and Wilderness Committee are going to federal court to challenge the decision to approve. The Lummi US Indigenous Nation is now also taking court action.

In addition the BC Environmental Assessment Office (EAO) is seeking public feedback (closing date June 8 2023) on draft assessment materials that the BC Government will use to decide if the project should proceed. Unless the BC Government denies project approval it must answer these same questions.

### 1. Summary

The RBT2 project was approved:

- ✓ Over a mountain of opposition;
- ✓ With political interference
- ✓ Ignoring Environment Canada scientists’ concerns
- ✓ Ignoring significant wide ranging credible research and science, much of it published in peer-reviewed science journals, demonstrating the project’s significant adverse environmental effects that cannot be mitigated.
- ✓ Ignoring the facts and evidence.

Major environmental groups, scientists expert in their field, citizen scientists, the Cities of Delta, Richmond and White Rock, MPs, members of the public rose up and voiced their opposition to RBT2. As the final phase of the environmental assessment concluded that opposition grew and grew. (Attachment A has a partial list of opposing groups).

Prime Minister Justin Trudeau went on record in the documentary “Soul of the Fraser”, released in late 2022, stating that the decision on RBT2 would be based on science. But it was not. The federal cabinet did the exact opposite.

The NDP raised concerns during question period in the House in February 2022 regarding the political interference with this project and the science gathered by Environment Canada scientists being hidden from the assessment and the public. Nothing changed – government science continued to be withheld and their scientists muzzled.

When the approval came on April 20 2023 the Minister of Natural Resources made the announcement not the Environment Minister whose responsibility it is. Why? The Natural Resources ministry has nothing to do with this project. Where was the Environment Minister? Where was the MP for Delta Carla Qualtrough, also a cabinet minister, whose riding the project is in? Where was the “justified in the circumstances” explanation, given that Vancouver is seeing its container business decline? It is no coincidence that VFPA released their Q1 2023 container volumes the day after the approval – showing that Q1 2023 is 15.3% lower than the same period in 2022.

Adding a second container terminal on Roberts Bank was for VFPA and the federal government the easy solution.

- Road and rail infrastructure already exists.
- Warehouses and logistics centres already built close by – on prime agricultural land - with the expectation by their owners that it would be approved and with space for more.
- \$ Millions already invested by VFPA

Easy, that is, as long as VFPA and government do not care about the Roberts Bank ecosystem, its biodiversity and the millions of migratory and other shorebirds, salmon, Southern Resident Killer Whales, other fishes and wildlife that rely on that ecosystem for their very existence.

This decision announcement is not the end of the story. That story will be written when all the facts and misinformation is revealed and project approval is rescinded.

## 2. What led Cabinet to decide to approve?

After almost 13 years that included public consultation, a review by independent panel, public hearings, a panel report and recommendations, requests for further information, the project approval went before the Governor in Council (federal cabinet) in early 2023. The approval announcement came right at the legislated deadline. The Environment Minister’s decision statement reads:

“I have determined RBT2 is likely to cause significant adverse environmental effects”. That is why it went to Cabinet, acting as Governor in Council, who then determined these effects are justified in the circumstances.

Assuming the federal cabinet recognized it was not OK to denigrate the ecosystem pushing species to extinction - they had to believe that:

- a). The mitigation proposed in the draft conditions and others that were added were sufficient to defray/mitigate the negative effects.
  - b). The environmental risks were justified because the additional terminal capacity is essential for Canada's trading needs.
  - c). The project is economically viable.
- None of these are valid.

That means they:

- (i). Ignored the ECCC science and their scientists' level of concern;
- (ii). Bought into the VFPA contention that Vancouver was running out of terminal capacity and the best way to address that was RBT2.
- (iii). Ignored the precautionary principle (if there is a significant risk of dire and irreparable consequences, don't do it!).

### 3. What ECCC Science Was Ignored?

Environment and Climate Change Canada (ECCC) in its environmental assessment has stated repeatedly that the man made Island for RBT2 Project will remove the salinity trigger for high fatty acid production by diatoms in biofilm on Roberts Bank in the Fraser River Estuary, resulting in species-level consequences for Western Sandpipers. Despite ECCC scientists demonstrating with their research that these effects will be permanent, irreversible, continuous and immitigable the Federal Government approved the Project.

The man made island for RBT2 will restrain outflow from the Fraser River and reduce the salinity of water over the intertidal mudflats of Roberts Bank during the spring migration period. These salinity changes will impact both the quantity and quality (especially fatty acid production) of biofilm that will, in turn, negatively affect the migration success, reproduction and survival of Western Sandpipers.

More important is that the effects from RBT2 are not just about Western Sandpipers – these shorebirds are the window into the ecological functioning of the Fraser River Estuary and reveal that the ecological integrity of the last remaining natural large intertidal bank will be compromised. Curtailing fatty acid production from intertidal biofilm on Roberts Bank will have cascading negative effects up the food web, impacting commercial fisheries, including salmon and crab, and apex predators such as Orca.

Furthermore ECCC scientists disproved the Vancouver Fraser Port Authority's contention that it will recreate biofilm that is lost, as well as the mitigation measures in the Decision Statement that allow for biofilm habitat creation or enhancement.

ECCC scientists are on public record during the assessment process for RBT2 stating categorically that:

- 1) There is not an equivalent muddy intertidal area available in the Fraser River estuary and delta that could compensate for the loss of the biofilm on Roberts Bank (i.e. Quantity)- plus,
- 2) Any area( for consideration would need to be subject to a similar salinity "trigger" occurring on Roberts Bank during the April/May period such that fatty acid production would peak during the breeding migration of sandpipers (i.e. Quality and Availability).

#### 4. Why it got approved:

- a). Ottawa allowed the project proponent, VFPA, to dictate the Panel's terms of reference. This meant the Panel did not include several key issues in its assessment.
- b). The Panel did a woefully inadequate job. They:
  - ✓ Expressed doubt surrounding the salinity trigger and the impact on biofilm.
  - ✓ Claimed some of the ECCC concerns were inconclusive
  - ✓ Accepted the VFPA science rather than that from ECCC.
  - ✓ Accepted the VFPA story that biofilm could be recreated on the scale needed to replace what will be lost.
  - ✓ Refused any discussion on alternative locations i.e. Prince Rupert.
  - ✓ Refused to consider the idea that assessment contractors were paid by the VFPA and could therefore be biased by a conflict of interest.
  - ✓ Allowed VFPA a closing statement each day of the hearings with no rebuttal. VFPA used that to trash any evidence they didn't like, especially on the ECCC science on biofilm and of the independent expert witnesses that testified at the hearings.
- c). Environment and Climate Change Canada (ECCC) scientists failed to present the severity of their concerns strongly enough before, during and after the hearings. They were weak in the way they identified the key environmental issues. They never stood up to the VFPA, nor did they challenge the Panel on its conclusions. ECCC never came out and stated the project must not be built in any shape or form.
- d). The Ottawa bureaucracy suppressed some of the science. Firm evidence, obtained through Access to Information, shows this clearly. For example Ottawa management buried the ECCC scientists closing submission to the Panel. Had the Panel got that submission some of their conclusions and recommendations would have been different. By the time that submission was obtained and published it was too late - the Panel report was already submitted to government.
- e). A significant factor in the decision to approve was the support from the 26 First Nations that signed beneficial participation agreements with VFPA. Denying approval would not have gone down well since there were indeed "benefits" to be had by First Nations from these agreements. These relationships were developed by VFPA in private closed workshops over a period of 18 months at which ECCC scientists were excluded. VFPA sold their so-called biofilm science including large-scale biofilm restoration, as well as the biofilm guidance manual. First Nations never got an opportunity to have the ECCC science explained. VFPA used those workshops to denigrate the ECCC science. VFPA has never accepted the science



surrounding the salinity trigger, which is central to understanding why the man-made island will degrade the diatoms that create fatty acids.

f). IAAC bias in favour of the VFPA. As soon as the IAAC published their draft conditions it was evident RBT2 was likely to get approval. The IAAC staff bought into the VFPA science hook, line and sinker. Is there is a linkage with the Ottawa bureaucrats who were constantly trying to water down the ECCC science? Were these some of the IAAC staff that wrote the draft conditions?

g). The VFPA lobbying in Ottawa paid off. They had a senior person in Ottawa and being a crown agency they were able to work the system,

h). Cabinet and support staff did a terrible job of verifying the VFPA claim that more terminal capacity is needed and the only place to add it is in Vancouver.

Did they check?

- ✓ What DP World is planning for its Prince Rupert expansions?
- ✓ The veracity of VFPA's comparisons of actuals versus forecasts?
- ✓ Whether container traffic is expanding at the rate VFPA says – 5%? It is not. The Compound Annual Growth Rate for the last ten years is less than 3%. Full container loads in 2022 were lower than every prior year as far back as 2013. VFPA container traffic for Q1 2023 is 15.3% lower than the same period in 2022.
- ✓ The volumes of US traffic going through VFPA. More container traffic – most if not all US – is now moving through the Panama Canal direct to US East Coast and Gulf ports. All North American pacific coast ports are seeing shifts in container traffic patterns.
- ✓ The ability of road and rail infrastructure to support the expansion? The rail route through the Fraser Canyon is already heavily congested. It was closed for 8 days in 2021 because of the BC flooding.
- ✓ Highways, especially in Delta, already heavily congested.

i). The GCT aggressive stance in battling VFPA appeared to annoy Ottawa. The Federal government vigorously defended GCT's court action brought against the VFPA.

j). Is this government serious about protecting vulnerable ecosystems and the wildlife that relies on it? They make all the right gestures - UN Biodiversity Conference, endorsing the newly established Fraser Estuary KBA etc., but then ignore them and do the exact opposite.

k). The China factor. This Liberal government has demonstrated it is weak on China. Take a look at the Canada/China Business Council. Many of the key players, who are still doing a lot of business and making large profits in China, are big Liberal party backers. Note VFPA does not have an operator for RBT2. Three times it has tried. It would not be a surprise if VFPA awarded the contract to one of three or four Chinese companies - China Merchants, Shanghai International, Cosco and CK Hutchinson Holdings. All of these now operate ports outside of China under the Chinese Belt and Road Initiative. CMA CGM, another big port operator, also has a joint venture with China through Terminal Link Joint Venture. CMA CGM was one of those bidding to operate RBT2 previously.

l). Industrial land in the lower mainland is scarce. But investors already built warehouses on prime farmland in Tsawwassen First Nation territory close to

Roberts Bank, with more land available. Did they do so in the expectation that RBT2 would be approved?

m). Cumulative Effects were not properly considered by the Panel and have been ignored by the federal government. RBT2 is not the only port/industrial project in the Estuary. There is Fortis LNG at Tilbury; the Airport Fuel Depot; possibility of a second cruise ship terminal in the river; GCT Berth 4. Add all of this vessel traffic and then include Trans Mountain as well as vessel traffic from expansions at Seattle and Tacoma ports and the vessel transits through sensitive habitat in the Salish Sea and Juan de Fuca will see huge increases.

n). Mitigation. Will those 373 conditions be enforced? Not likely. Many years ago VFPA was asked and agreed to bury the power lines because they were killing wildlife - in particular barn owls. The power lines are still there. Anything VFPA finds inconvenient they either ignore or say it is not feasible/too expensive.

## 5. Is RBT2 Justified and Economically Viable

At some point in the 2030s West Coast Canada is likely to require additional container terminal capacity. VFPA says the west coast marine container terminals in Canada will reach full capacity by the mid- to late-2020s. The actual traffic volumes do not support that statement. BC container terminals currently have in excess of 1.3 million TEU (containers) spare capacity. With new capacity being added it will be well into the 2030s before more capacity is needed. Questions not answered:

a). Is RBT2 the best place to provide that additional capacity? No, because:

(i). The Fraser Estuary has already lost over 80 percent of its natural habitat.

(ii). RBT2 will add to that environmental deficit.

(iii). How many more vessel transits can the Salish Sea and Juan de Fuca Strait safely handle?

(iv). Road and rail corridors; both in the lower mainland and to points East are already heavily congested. The Fraser Canyon cannot handle more container transits by rail without delaying other bulk commodities such as grain.

(iv). There is a shortage of industrial land for increases in logistics infrastructure and empty container storage.

b). Is RBT2 economically viable? No. At today's estimated cost of \$3.5 billion it will already be the most expensive greenfield port development in the world. By the time of construction start that cost will likely balloon to over \$4 billion.

c). The inner harbour Centerm terminal expansion project is set to increase the terminal's container handling capacity by two-thirds by increasing the terminal footprint by 15 per cent, from 900,000 to 1.5 million TEU. Vanterm has plans to expand.

d). Are there other BC ports better able to add the additional capacity when needed. Yes. Prince Rupert is expanding its Fairview Terminal and plans to add a second terminal capable of adding as much capacity as RBT2, but at much less cost. Prince Rupert has few if any environmental constraints, is two sailing days closer to Asia and has better, uncongested rail access to the East.

e). Is there a possibility of too much container terminal capacity being added such that all terminals lose money? Likely.

## 6. Next Steps

There is time to develop a strategy to get the approval decision reversed, or at least reconsidered. However this needs to be done while the Liberals are still in power. The chances of getting this project stopped under a conservative government are slim to none.

Possible actions:

- ✓ Get the media more involved. Have them do an in depth investigation.
- ✓ International embarrassment (one UK newspaper already slammed RBT2).
- ✓ Go public with the flaws in the decision.
- ✓ Make potential bidders for RBT2 construction and operation aware of the environmental consequences.
- ✓ Engage with and try to involve international environmental groups.
- ✓ Advise the major banks of the environmental consequences. Canada is a designated country under the Equator Principles. Most banks will try to avoid project financing where there are negative impacts on project-affected ecosystems, communities, and the climate.
- ✓ Court Injunction?

Potential areas for possible court action include:

- ✓ Unlawful under the Species at Risk Act (Action already taken by Ecojustice).
- ✓ Failure to properly consider the ECCC science.
- ✓ Migratory Birds Convention Act.
- ✓ No justification to add capacity when the container market is changing and Prince Rupert provides a more environmentally friendly and overall superior alternative and the Panel refused to consider it.

## 7. Conclusion

The Fraser Estuary and in particular Roberts Bank are internationally recognized as one of the most important ecosystems on the west coast of North America. It is a major stop on the Pacific flyway and provides critical wintering grounds for the highest number of waterfowl and shorebirds found anywhere in Canada. The area is critical for the already endangered South Resident Killer Whales, Fraser River Salmon stocks and other wildlife.

Roberts Bank Terminal 2 is an environmental disaster waiting to happen. The Fraser Estuary, having already lost of 80 percent of its natural habitat. is at a tipping point.

The Fraser Estuary and Roberts Bank must be protected and preserved. RBT2 cannot be allowed to go ahead.

June 5 2023.

**Groups opposed to Roberts Bank Terminal 2**

**Internationally recognized scientists**

[Letter from scientists regarding Roberts Bank Terminal 2](#)

**Salish Sea Institute, Western Washington University**

<https://iaac-aeic.gc.ca/050/evaluations/proj/80054/contributions/id/57756>

**Lummi Nation**

[Can This Tribe of ‘Salmon People’ Pull Off One More Win?](#)

**S’ólh Téméxw Stewardship Alliance (STSA)**

[RBT2 Conditions Feedback](#)

**Tsleil-Waututh Nation**

[Tsleil-Waututh Nation \(TWN\) comments on RBT2](#)

**International Longshore Workers Union Canada (ILWUC)**

[Open Letter to Government Regarding Roberts Bank Terminal 2](#)

**Sacred Lands Conservancy**

[RBT2 threatens salmon, our orca relations, and Indigenous life ways and livelihoods](#)

**Swinomish Indian Tribal Community, Suquamish Tribe, and Tulalip Tribes**

[Comments on Roberts Bank Terminal 2 Potential Environmental Assessment](#)

**Unitarian Church of Vancouver**

[UCV Opposes the Roberts Bank Terminal 2 Project](#)

**BCIT Rivers Institute**

[Letter from scientists regarding Roberts Bank Terminal 2](#)

**City of Delta**

[City of Delta, Council Report Jan 4, 2022](#)

**City of Richmond**

[Richmond joins Delta in opposing T2](#)

**Birds Canada and Nature Canada**

[Roberts Bank: Ottawa should reject a terminal expansion that puts human and environmental health at risk](#)

**Raincoast Conservation Foundation, Georgia Strait Alliance, David Suzuki Foundation, and Wilderness Committee**

[Terminal 2 expansion threatens orcas, salmon and climate action – Ecojustice](#)

**Friends of the Earth US**

[Friends of the Earth US activist comments on Roberts Bank T2 proposed project](#)

**Rivershed Society of BC**

[Comments on Terminal 2](#)

**The Waterbird Society**

[Comments on RBT2](#)

**OrcaLab**

[Please reject Roberts Bank terminal expansion proposal](#)

**Against Port Expansion in the Fraser Estuary (APE)**

[Against Port Expansion in Delta](#)

**Garden City Conservation Society**

[Garden City Conservation Society](#)

**White Rock and Surrey Naturalists Society**

[Roberts Bank Terminal 2 Project](#)

**Western Hemisphere Shorebird Reserve Network**

[Comment Letter on the Fraser River Delta Port Development](#)

**PenderPod**

[PenderPod is a community organization on Pender Island dedicated to honouring, protecting and defending the Natural Environment of the Salish Sea](#)

**BC Nature**

<https://bcnature.org/take-action/>

**Boundary Bay Conservation Committee**

[http://actionintime.ca/wp-content/uploads/2022/02/irreversible\\_harm\\_to\\_fraser\\_estuary.pdf](http://actionintime.ca/wp-content/uploads/2022/02/irreversible_harm_to_fraser_estuary.pdf)

**Fraser Voices**

<https://iaac-aeic.gc.ca/050/evaluations/document/132516>

**Wild Bird Trust of BC**

<https://mailchi.mp/wildbirdtrust/spring-opening-coastsalishplantnursery-20194592?e=bc5da82e9a>