



August 14, 2018

Cindy Parker  
Panel Manager, Roberts Bank Terminal 2 Project  
160 Elgin Street, 22nd Floor  
Ottawa ON K1A 0H3  
Via email [Panel.RBT2@ceaa.gc.ca](mailto:Panel.RBT2@ceaa.gc.ca)

Dear Ms. Parker,

**RE: Roberts Bank Terminal 2 Project**

I am writing on behalf of BC Nature (the Federation of BC Naturalists), which represents more than 50 naturalists' clubs and 6500 members province-wide, in response to the notice of the Panel Manager posted July 6, 2018 on the CEAA Registry for the Roberts Bank Terminal 2 Project.

The notice asks the question as to whether the information provided by the Vancouver Fraser Port Authority (VFPA) on this project thus far is sufficient to proceed with the Panel assessment and into the public hearing phase.

**So far, the information submitted fails to establish a reasoned, science-based rationale adequate to determine that the RBT2 project will not cause significant harm to the Roberts Bank ecosystem.** We align ourselves with the reports on the importance of biofilm submitted by Environment and Climate Change Canada (ECCC) and the Department of Fisheries and Oceans (DFO). We agree that further port development on Roberts Bank risks breaking the chain of the Pacific Flyway, as suggested by ECCC in 2005. The data suggest that the project would cause significant harm and cause irreversible damage to this critical ecosystem.

In our opinion, the information as of July 6 is insufficient to support the continuation to the hearing or the continuation of the project. We are in full support of the position presented by Mr. Roger Emsley in CEAA #1215, dated July 17, 2018. We agree with each of the thirteen issues that he has identified. Highlights from Mr. Emsley's recent submission include:

- Biofilm: ECCC is clear: negative impacts will be immediate and mitigation is not possible.
- Need a full ECCC response on the latest VFPA submission, CEAA #1215
- Too much risk to wildlife and ecosystems; apply the precautionary principle
- Western Sandpipers have been declining, according to Canadian Wildlife Service, by 2 percent a year. Roberts Bank is a critical stop on their northward migration, and further port development risks breaking the chain of the Pacific Flyway
- Similarities between East Asia Flyway and Pacific Flyway as raised by ECCC in CEAA 581.

BC Nature strongly recommends that the Review Panel reject the VFPA application for port expansion on Roberts Bank, as posing too great a threat to the wildlife and ecosystems that depend on the habitats of the Fraser delta and Salish Sea.

Yours truly,

A handwritten signature in cursive script that reads "Alan E. Burger". The signature is written in black ink and is positioned below the text "Yours truly,".

Alan E. Burger, PhD  
President: BC Nature  
(Federation of BC Naturalists)

Contact information: Dr. Alan E. Burger, President – BC Nature,  
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