May 5, 2020

Honourable John Wilkinson

Minister of Environment and Climate Change  Jonathan.Wilkinson@parl.gc.ca

Dear Minister Wilkinson:

Re: Roberts Bank Terminal 2 Expansion Project

I write to you on behalf of BC Nature regarding the results of the Federal Panel Review for the Roberts Bank Container Terminal 2 Project (RBT2). BC Nature has expressed its environmental concerns about this project to the Panel and we have previously opposed it going ahead, based on the significant adverse environmental effects predicted to result.

BC Nature, representing more than 50 naturalists’ clubs and 6,000 members province-wide, has followed the RBT2 developments as far back as 2014. Since then we have repeatedly called for this project to be rejected. BC Nature participated throughout the Environment Assessment by Review Panel. Professor Pat Baird presented BC Nature concerns in a written submission in October 2016 wherein we stated that the project is ill-advised from an environmental standpoint. Professor Peter Beninger registered as a public hearing participant and presented on behalf of BC Nature on May 27, 2019, again stating environmental concerns and rejecting the Port Authority position on biofilm.

We encourage you and cabinet to reject this proposed project, based on the results of the Review Panel. In that report the Panel makes it very clear that they believe that the Project is likely to cause significant adverse environmental and cumulative effects on the ecosystem, even taking into account the implementation of the suggested mitigation measures. The Panel concludes that the proposed offsetting plan submitted by the Vancouver Fraser Port Authority for aquatic species would not suffice to compensate for the reduction in productivity associated with the loss of 177 hectares of habitat on Roberts Bank. In making its recommendations the Panel relies on further study, research, monitoring, and follow-up. The findings of these recommended activities would come to light after the project proceeds, too late to mitigate adverse impacts. Furthermore, wetland mitigation efforts have a poor track record.

Because the Panel believed it to be beyond its mandate, it refused to consider other locations for container terminal expansion where there is sufficient capacity and expansion potential to satisfy Canada’s future trading needs. We believe that to be an oversight, as per the legal standards required by s19(1)(g) of the Canadian Environmental Assessment Act.
Roberts Bank is the very crucible of the Fraser Estuary and cannot suffer any further industrial or port development. Terminal 2 risks breaking the chain of the Pacific Flyway and will negatively impact hundreds of thousands of shorebirds, salmon, crabs, already endangered Southern Resident Killer Whales, and other wildlife. We look to you Minister Wilkinson to deny approval of this project.

Thank you for your consideration.

Yours truly,

Cornelis (Kees) Visser, Ph.D., P. Geol.
President, BC Nature

Cc The Honourable Carla Qualtrough, MP Delta, Minister of Employment, Workforce Development and Disability Inclusion, Carla.Qualtrough@parl.gc.ca
The Honourable Bernadette Jordan, Minister of Fisheries, Oceans and the Canadian Coast Guard, Bernardette.Jordan@parl.gc.ca
The Honourable Marc Garneau, Minister of Transport, Marc.Garneau@parl.gc.ca