

## **Decision time For Roberts Bank Terminal 2.**

What is going on behind the scenes? How will this play out?

- VFPA: (Vancouver Fraser Port Authority)
  - Are lobbying hard in Ottawa. They promote RBT2 regularly, with billboards, promo pieces in The Hill Times, iPolitics etc.
  - Are using proxies to support RBT2, with articles in friendly media
  - It appears may be approaching individual cabinet ministers
  - Have signed up a number of First Nations to confirm they support RBT2
  - Advertises regularly in the media
- Certain cabinet ministers have their Ottawa teams involved
- Global Container Terminals (GCT) are using the media - print and TV - to criticize and denigrate RBT2.
- The GCT Deltaport Berth 4 assessment process has started. The Impact Assessment Agency of Canada and the British Columbia Environmental Assessment Office have commenced the assessment.
- It is even possible cabinet will defer any RBT2 decision until the Deltaport Berth \$ assessment is complete.

What does the governing legislation require?

1. If the Minister Environment and Climate Change Canada decides that RBT2 is likely to cause significant adverse environmental effects then he must refer it to the Governor in Council, where they must decide whether those effects are justified in the circumstances.

2. The science, facts and evidence are clear. RBT2 will result in significant adverse environmental effects. The Review Panel said so. Environment Canada has said so repeatedly. But cabinet will be debating how significant are these adverse effects and are they justified in the circumstances?

3 Is it likely RBT2 will disrupt the Roberts Bank ecosystem, the intertidal food web, and negatively impact entire species of wildlife with the possibility that some will go extinct? The science facts and evidence say yes, but that then leaves cabinet with a number of issues:

- Which science do they use, Environment Canada's or VFPA's?
- Do they accept the Environment Canada position that biofilm cannot be recreated to the scale necessary to replace that which RBT2 will destroy? Or do they buy the VFPA argument that biofilm will not be impacted and if it is it can be recreated?
- Do they believe VFPA who claim mitigation measures will offset any adverse environmental effects? Or do they accept the Environment Canada position that effects will be immediate, permanent, continuous and cannot be mitigated?
- Will they buy into the VFPA proposal to build half the man made island and monitor the environmental effects? Or will they accept the Environment Canada position that whilst the adverse environmental effects will be immediate they will not be identifiable until it is too late?
- Finally, whatever level of significant adverse environmental effects Cabinet accepts as factual they then have to decide are these justified in the circumstances".

4. The answer to the question are they justified in the circumstances is clearly NO. The economic argument – or more specifically the lack of one - is borne out by the facts:

a). West Coast Canada has sufficient container terminal capacity today to satisfy Canada's trading needs well into the 2030s. According to the terminal operators there is in excess of 1 million spare container capacity today. And what is clear is that planned expansions separate from RBT2 will add significant capacity during the 2030s.

b). VFPA has never reached the forecast levels that VFPA CEO Silvester claims (5% per annum). The compound annual growth rate (CAGR) for VFPA over the last 14 years for total TEUs handled now languishes at 2.57%. Total TEUs handled by VFPA in 2022 is down by 3.3% over 2021. Discounting the empty containers handled, full containers (TEUs) are off by 9% compared to 2021. In fact the volumes handled are only a little better than 2019, the last full year prior pandemic. Yet Mr. Silvester still claims the west coast will run out of container terminal capacity as early as the mid 2020s.

c). VFPA is losing some of its US container traffic. More US traffic is now moving direct via US gulf or East Coast ports

d). Expansions already underway are adding to the West Coast terminal capacity:

(i). The DP World operated Centerm terminal is just finishing an expansion that has increased its capacity by 600,000 containers (TEUs) to 1.5 million.

(ii). The Prince Rupert Fairview terminal is continuing its expansion, bringing its capacity up to 1.8 million containers by 2024.

(iii). GCT is to expand its Deltaport terminal by adding a fourth berth.

(iv). DP World plans to build a second container terminal in Prince Rupert with an initial capacity of 2 million containers and the potential to expand to 5 million or more.

e). Add all that up and West Coast Canada will have in excess of 10 million container terminal capacity by the mid 2030s, sufficient for Canada's trading needs for decades to come without ever building RBT2.

When the decision is announced, since Cabinet deliberations are secret, we will likely not know what science, facts and evidence led them to their decision.

But, bottom line the Precautionary Principle applies. If the Governor in Council decision is anything other than an outright denial of approval there will be further action, including the possibility of court cases and an injunction.

Roberts Bank and the Fraser Estuary are too important to let RBT2 be built.