



February 14, 2023

Prime Minister Justin Trudeau,
Deputy Prime Minister & Minister of Finance Chrystia Freeland,
Minister of Intergovernmental Affairs, Infrastructure & Communities Dominic LeBlanc,
Minister of Innovation, Science & Industry Francois-Philippe Champagne,
Minister of Int'l Trade, Export Promotion, Small Business & Economic Dev. Mary Ng,
Minister of Natural Resources Jonathan Wilkinson,
Minister of Fisheries, Oceans & the Canadian Coast Guard Joyce Murray,
Minister of Environment & Climate Change Steven Guilbeault,
Minister of Crown-Indigenous Relations Marc Miller,
Minister of Transport Omar Alghabra,
Minister of Tourism Randy Boissonnault,
Minister of Health Jean-Yves Duclos

Honourable Prime Minister and Cabinet Ministers:

Nature Salt Spring is a local club of BC Nature that grew out of our deep concerns about the Climate and Biodiversity Crises. We know that healthy, sustainable human societies can only grow and flourish if citizens are committed to understanding, enjoying and protecting the ecosystems that support us and all life on the planet. On behalf of our members, we call on all governments to recognize and act in accordance with this truth.

With this in mind we urge you, as federal Ministers directly responsible for the various aspects and impacts of the proposed RBT2 project, to deny the application of the Vancouver-Fraser Port Authority to expand the Roberts Bank development and build a second terminal at the mouth of the Fraser River. We call on you to recognize that the estuary and delta provide critical habitat for 102 at-risk species, and are globally significant due to being on the Pacific Flyway. Doubling the terminal size and destroying another huge area of this vital ecosystem is completely unacceptable, particularly in light of your government's expressed support of world-wide efforts to protect biodiversity.

Scientists with Environment and Climate Change Canada have studied the RBT2 proposal and determined that building a new terminal will result in significant adverse environmental effects that cannot be mitigated. Of special concern are the negative impacts to shorebirds such as the Western Sandpipers, which will be immediate, continuous, and irreversible. During migration these birds depend for their survival on the particular biofilm found on the mudflats of the Fraser estuary. Careful research has shown that the VFPA suggestion to mitigate the negative effects by creating additional biofilm are completely unrealistic, as it would be impossible to recreate biofilm at a scale necessary to replace that which would be lost if the expanded terminal was built.

Other species of prime concern are the 5 species of salmon that use the estuary as a nursery, and the iconic Southern Resident Killer Whales, which depend on Chinook salmon

in particular. Salmon stocks have crashed in recent years, and one of the key causes is human disturbances to the natural functioning of the Fraser estuary. The tiny fry are unable to access the quiet eddies and side-channels of brackish water that used to exist here. They don't have adequate opportunities to adjust to salt water before being swept out into the Salish Sea, and this has a drastic effect upon their rate of survival. The critically endangered Southern Resident Killer Whales thus lose their prime source of food, which leads to malnutrition, starvation, and reduced reproduction rates. Increases in shipping traffic will further stress these Orca, contributing to potential population declines. With only 74 Southern Resident Killer Whales remaining, these cumulative impacts will likely lead to their extinction.

Recent restoration works, including breaching of jetties, provide a glimmer of hope for rebuilding salmon stocks. Protecting and rehabilitating the floodplain, marsh areas and eelgrass beds would lead to a future where fishing provides a strong economic base, and wild salmon contribute nutrient-rich food as in the past.

Work done by Tara Martin, PhD, and her graduate students at UBC has determined that in 25 years all 102 species-at-risk in the lower Fraser could be recovered through protection and restoration of habitat, pollution control and green infrastructure. The cost would be about \$400 million, just 10% of the projected cost of RBT2. It's time that the myriad important environmental values of this region be recognized and concerted efforts made to achieve this recovery, not jeopardize it.

There is no need or economic justification for the extremely expensive proposed RBT2 project. The Port Authority's projections for volume increase are not substantiated by reality, and the number of loaded containers handled in 2022 was 9% less than in 2021. Currently, terminals managed by the Vancouver-Fraser Port Authority have over a million spare container capacity. Statistics show that the US is using the Roberts Bank Terminal less than before, and this trend is expected to continue. Furthermore, the Port of Prince Rupert is planning to develop a new terminal capable of handling 2 million containers, and its location allows for shorter trips and more efficient shipping to and from Asia than the Roberts Bank site.

We note that Prime Minister Trudeau is on record as stating the RBT2 decision will be based on science. We applaud this approach, and call on you and all the Cabinet Ministers to carefully consider the findings and statements of the Environment Canada scientists. Their research confirms that environmental damage from the proposed RBT2 to the Fraser Estuary would result in degradation of the food-web, and declines in wildlife species to the point of potential extinction for millions of migratory and other shorebirds, salmon, Southern Resident Killer Whales, eulachon, crabs and other wildlife species.

Please don't allow this to occur in the Lower Fraser, a recently designated Key Biodiversity Area. Say NO to expanding the Roberts Bank Terminal. Say YES to a vibrant, restored and sustainable ecosystem for current and future generations of wildlife and humans to enjoy, a legacy of which you can be justly proud.

Sincerely,

David Denning, Kathleen Maser, Peter McAllister, Pat Miller, Susan Kronick, Jean Wilkinson
Ren Ferguson, John Neville and Heather Neville, Steering Committee for Nature Salt Spring

Cc: Elizabeth May, MP for Saanich-Gulf Islands